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United States
Department of
Agriculture

Forest
Service

Southwestern
Region

July 1986

Public Comments and Forest Service Response to the DEIS, Proposed Coronado National Forest Plan

Volume II

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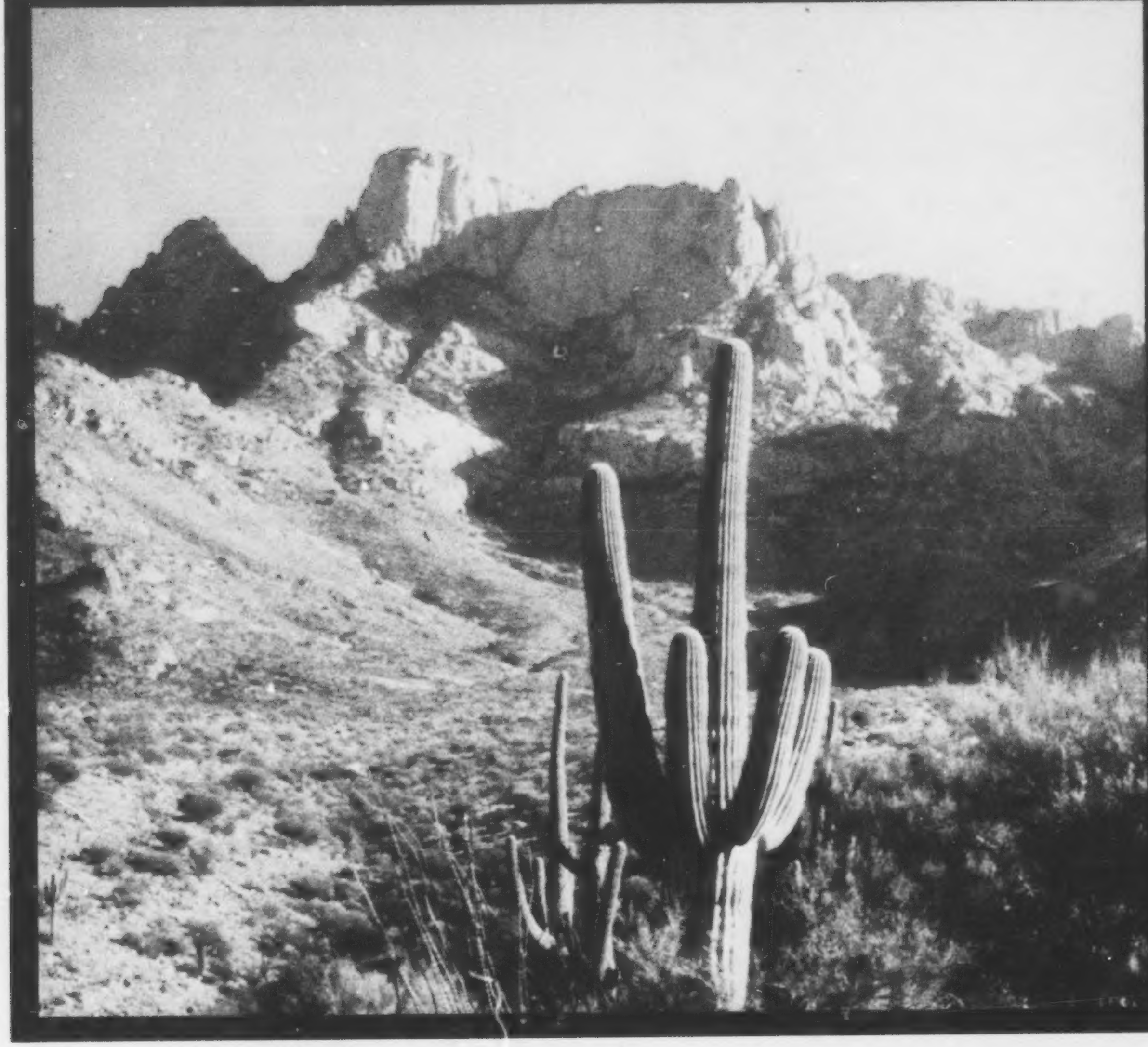

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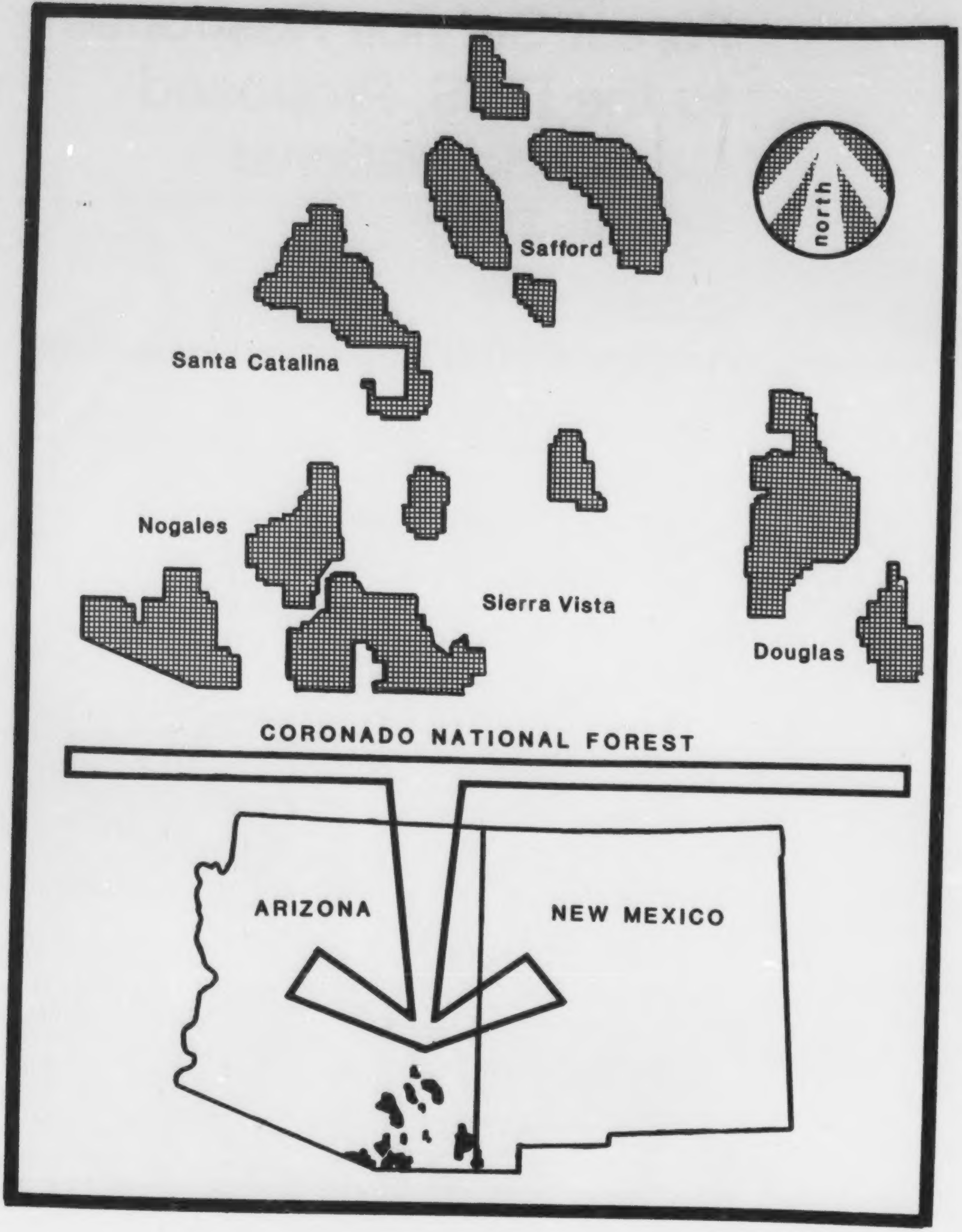

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Coronado National Forest

Land and Resource Management Plan
Environmental Impact Statement
Agency Response to Public Comment

Volume II

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Introduction

A Draft Environmental Impact Statement and Proposed Plan were published in December 1982. The public comment period ended in April 1983. The following changes were made to the Proposed Action and alternatives as a result of public comments received at that time.

1. The Proposed Action and all alternatives were revised to achieve a balance of livestock grazing capacity and use within two periods (20 years) or less.
2. The Proposed Action was revised to allow for motorized vehicle use only on roads and trails for the entire Forest.
3. The Proposed Action was revised to recommend a natural history area (zoological area) designation for Guadalupe Canyon.
4. Proposed management direction for the South Fork of Cave Creek was revised to allow public motor vehicle access. The proposed boundary of the zoological-botanical area was also revised to exclude the road, recreation facility, and summer homes.
5. The Proposed Action and all alternatives were revised to display management choices for the proposed Mt. Graham astrophysical area.

This document consisting of Volumes I and II, provides a record of Agency response to public comment received on the Draft Environmental Impact Statement and Coronado National Forest Plan which was published May, 1985. This includes a letter from the U.S. Department of the Interior Fish and Wildlife Service documenting the formal consultation process and biological opinion for threatened and endangered species as required by the Endangered Species Act of 1973 (P.L. 93-205), as amended. The public comment period ended October 11, 1985.

Comments and corresponding responses on the Plan are arranged alphabetically. For most letters of comment, specific points raised have been identified with brackets and a number which corresponds to a number listed with the Agency response.

Some comments were broad in nature and did not address specific points of challenge to the Environmental Impact Statement or Forest Plan. In these instances, the Agency response follows the letter of comment, but is not keyed to specific points within the letter of comment.

Page numbers referenced in the responses correspond with page numbers in the Draft EIS and Draft Plan or Final EIS and Final Plan as appropriate.

In accordance with 40 CFR 1503.4, public comments were treated in the following ways:

1. Defer decision on the proposed Mt. Graham astrophysical area (3500 acres) to the separate EIS being prepared. Comments received on the proposed astrophysical area are being considered in preparation of the separate EIS. A listing of those submitting comments is included in this response document.
2. Revise the Proposed Action and Alternative C to include a wilderness recommendation for the entire (62,000 acre) Mt. Graham Wilderness Study Area.
3. Revise the Proposed Action to eliminate livestock grazing on the Redfield Allotment (Galiuro Mountains).
4. Revise the Proposed Action map to include additional riparian areas inventoried since the 1982 DEIS.
5. Comments offering technical additions and corrections or pointing out inconsistencies were used to revise the final documents.
6. Comments pointing out areas where the DEIS or proposed Plan needed clarification were used to clarify those documents.
7. Comments questioning the analysis or the rationale for decisions were answered in response to the comments.

National Audubon Society
APPLETON-WHITTELL RESEARCH RANCH SANCTUARY
BOX 44, ELGIN, ARIZONA 85611 (602) 455-5522

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
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July 31, 1985

Mr. R.B. Tippeconnic
Forest Supervisor
Coronado National Forest
Federal Building
300 West Congress
Tucson, AZ 85701

Dear Mr. Tippeconnic,

I would like to comment on the sections of the DEIS for the Proposed Coronado Forest Plan which concern the Research Ranch.

First, I recognize the balance you must strike in management of the forest. In general, I support Alternative D. I would urge you to consider additional management of the forest lands in the Research Ranch to safeguard as much as possible the considerable research investment made on those lands. I will offer comments by Issues and Opportunities as they affect the Research Ranch:

1. Recreation

The Research Ranch provides significant dispersed recreation for the local population. I support the standards and guidelines of Management Area 8 as they regard recreation on the Research Ranch.

1a. Recreation:Off-road Vehicles.

Because the Research Ranch is close to Fort Huachuca, a variety of military staff use the Lyle Canyon area for off-road recreation. Many erosion scars mark the hillsides. I support the management standards and guidelines in Management
1 Area 8 specifically to "close, drain and revegetate roads that are determined to be unneeded for further use." Could the forest work with Fort Huachuca in public education on a continuing basis to minimize abusive off-road practices? In addition, we have had several instances of abuse of the Forest lands by residents of Westgate. Similar education may be helpful there as well.

2. Wilderness

Wilderness issues are considered under Management Issue 1.

3. Visual Resources

2 Visual resource management is not specifically addressed in the Proposed plan as it regards Management Area 8. However, we suport the general guideline for management to provide opportunities for nondisruptive research and education as presented in the proposed plan.

4. Cultural Resources.

3 Many visitors to the Research Ranch do not understand that it is basically a biological research station for graduate education with students from universities in Arizona and elsewhere. I would suggest that as interpretive planning goes forward, this important role of the Research Ranch is explained to the public.

5. Wildlife, Threatened and Endangered Species.

a. Wildlife

AMERICANS COMMITTED TO CONSERVATION

Hunters use the Reserach Ranch for much of the year. Most of the hunters
are residents of Cochise and Santa Cruz counties. Javelina, Quail, Mule Deer,
White-tailed Deer, Antelope, Coyotes, and Rabbits are hunted. This clearly
limits the kinds of studies possible on social groups or individuals of these
species. Researchers cannot count on long term availability of groups or
4 individuals because they may be removed by hunters. This has not been a major
conflict between hunters and researchers, and may be an issue resolved by
consultation with Arizona Game and Fish Department staff and forest wildlife
managers. Game production from the Research Ranch under rangeland management
level A is a novel research opportunity on the forest.

5 Potentially a more serious conflict between researchers and sport shooters arises. The sport shooter can present a hazard to researchers in the field. Target shooters are often unaware of researchers or the housing facilities for researchers. Targets used by the shooters have included permanent vegetation markers and non-game wildlife species which are under long term study. Could the forest consider closing the Research Ranch to firearms except during established hunting seasons?

b. Threatened and Endangered Species

I support more funding for the endangered species program in the Coronado Forest.

6 Current efforts to preserve the rare plant species of the forest should be maintained and enhanced. Researchers here report Talinum humile from the immediate area and the forest. This plant was known in the 1880's in Grant County New Mexico and the current Arizona locale is the only known population in the world. Please include this species in your management plans (DEIS, p.73, Table 27) for plants of concern. I understand it will be proposed for listing as "Endangered" under the Endangered Species Act by late 1985.

I support the reintroduction efforts for several animals, including the Gila Topminnow to Turkey Creek of the Research Ranch. The forest lands on the Research Ranch provide habitat for the Bunchgrass Lizard (NM Group II) and Gila Chub. The Research Ranch has been suggested as potential habitat for reintroduction for the Masked Bobwhite Quail. I would support reintroduction plans as outlined in the DIES for Black-tailed Prairie Dogs (AZ Group I).

6. Range Management

Current management practices on the Research Ranch provide a critical reference area for adjacent range management practices. Further, current practices have produced a dramatic improvement in range condition on the Research Ranch. I support range management level A on the Research Ranch as included in the proposed plan.

7. Timber and Forest Products

7 I urge the continued management practices to allow fuelwoods and timber to remain at undisturbed levels.

8. Plant and Animal Diversity

Current management on the Research Ranch has seen a dramatic increase in plant and animal diversity since 1970. I support the continuation of management practices as outlined in the Management Area 8 in the proposed plan with regard to the Research Ranch.

9. Soil and Water (Watershed Condition).

Research here indicates significant acid rain due to sulfur dioxide contamination occurs on the Research Ranch and the forest. The levels of acidity I have found can have detrimental effects of plant growth. This would probably affect all plant growth, thus grazing, wildlife and timber production.

8 I would suggest that the forest plan include funding for monitoring acid rain and perhaps include management funding for dealing with impacts of acid rain over the next 10 years. Wilderness areas (Miller Peak) may require particular monitoring for acid deposition.

10. Mineral Management

I support the standards and guidelines concerning mineral management practices and activities as presented in the proposed plan concerning Managenent Area 8. As presented in the plan, these would further the long term nature of undisturbed research sites offered by the Research Ranch to a growing number of scientists.

11. Lands

a. Special Uses.

I support the current management options for land use included in the Management Area 8 guidelines in the proposed plan.

b. Land Exchanges and Acquisitions.

9 Current maps identifying offered lands do not include the Research Ranch. We support this classification in the proposed plan.

12 . Special Area Designations

I strongly support the proposed action to establish the Canelo Research Natural Area (RNA).

I look forward to continuing our memorandum of understanding to meet the management objectives for Research Natural Areas (Proposed Plan, Management Area 8) for the balance of the Research Ranch not in the Canelo or Elgin RNA.

13. Protection

a. Fire Management

I support the proposed designation of the Research Ranch in zone 2 of the Fire Management Zones (Proposed Plan, Management Area 8). Working with your staff, I hope to continue the use of prescribed burns to investigate the natural role of fire in the Huachuca foothills. Proposed zone 2 designation of the Research Ranch is an adequate moderate plan which should allow natural fires to influence the natural ecosystem yet protect improvements and buildings.

14. Facilities

Current road, trail and facilities management levels (proposed plan) adequately meet Management Area 8 objectives and are in accord with the current management of the Forest lands in the Research Ranch.

15. Law Enforcement

9 I support the proposed plan's adequate funding to prevent theft, vandalism and illegal occupancy of land and capmsites. All of these are continuing managment concerns on the Research Ranch.

Thank you for sending us a copy of the proposed plan and considering our suggestions.

Sincerely,

Mark R. Stromberg, Ph.D.
Manager

cc:Jerry Deiter, Sierra Vista DR
Dusty Dunstan, NAS

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Tucson Citizen
Friday afternoon
Tucson, Arizona/Friday, May 3, 1985
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Acid rain in southeast Arizona may be worst in world

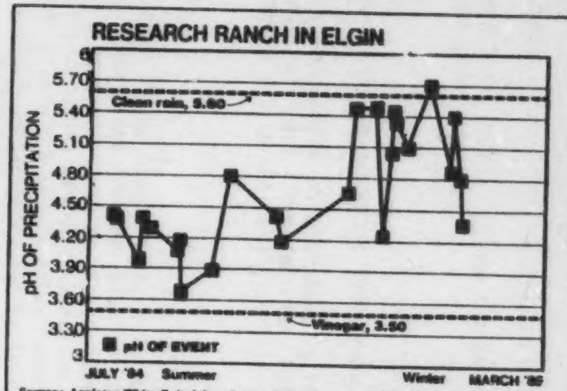
By CARLA McCLAIN
Citizen Staff Writer

Acid rain has been falling in parts of southeastern Arizona in the past year at levels of acidity as bad — and sometimes worse — than levels that are killing off forests and lakes in the industrial northeastern United States.

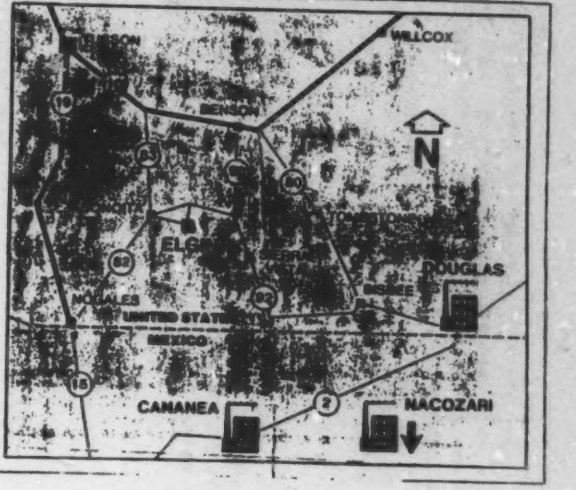
"Our rain here, when it is acid, is among the most acidic in the country, actually in the world," said Mark Stromberg, zoological researcher and manager of the Appleton-Whittell Audubon Research Ranch in Elgin. The ranch is near the border of Santa Cruz and Cochise counties, where acid rain has been monitored for the past nine months.

The monitoring effort in southeastern Arizona is part of a larger acid rain study of the western United States, conducted by scien-

ACID, Continued Page 3A



Source; Appleton-Whittell Audubon Research Ranch Citizen chart/map by Paul Krause



During the summer months, when prevailing winds are from the south, blowing from smelters along the U.S.-Mexico border, rain falling at the research ranch in Elgin is the most acidic.

From Page 1

tists at the World Resources Institute and the University of California-Berkeley, where Stromberg's Arizona results have been verified.

Three factors emerging from Stromberg's research — when the acid rain falls, the wind direction at the time, and what particulates are contained in it — all point directly to pollution emitted from the "gray triangle" of copper smelters in Douglas, Ariz.; in Cananea, Son.; and one soon to open in Nacozari, Son., as the source of the acid rain, according to Stromberg.

The smelters — especially the Douglas smelter, called the "dirtiest" in the country by some scientists and operating with no pollution controls — have been targeted as part of the cause, also, of acid damage now being sustained by alpine lakes and forests in the Colorado Rocky Mountains.

Studies done by the Colorado-based Environmental Defense Fund, by Environmental Protection Agency and by National Park Service scientists, are linking Arizona's copper smelters with sulfuric acid rain falling in the high Rockies.

The Environmental Defense Fund has filed suit against Phelps Dodge Corp., owner of the Douglas smelter, seeking to have the emissions cut.

However, until this past year, no one had tested for acid rain in the local areas surrounding the smelters. Local residents and environmentalists long have suspected that such health problems as high birth defect and infant mortality rates in Cochise County are connected to toxic metals, traced to smelter pollutants, found in soils there.

Nor are measurements of acid rain being made in the Tucson area, said Pima Air Quality Control District officials.

"We are doing nothing here concerning acid rain," said Don Burtchin, senior air quality analyst with the district. "No one measures the acidity of rainfall here, not with any degree of accuracy."

The question of whether acid rain is affecting Pima, in addition to Cochise and Santa Cruz counties, recently was put to state health officials by members of the regional environmentalist organization Groups Against Smelter Pollution.

"The effects of smelter emissions diminish rapidly with distance from the source, such that the impact of the smelter triangle sources is lower in Tucson than in Cochise County . . ." answered Charles Anders, deputy state health director for environmental health. "Prevailing summertime winds in the smelter triangle area will carry the emissions in a north-northwest direction generally along the path of the San Pedro River, rather than into Tucson."

However, suspicious damage to plants along the hillsides of the Saguaro National Monument East has officials there concerned enough to consider monitoring the area for acid rain, Burtchin reported.

Acid rain is formed when pollutants such as sulfur dioxide (from smelters) or nitrous oxides (from auto exhausts) are emitted into the atmosphere, where they chemically mix with water vapors in the air, forming acids. They fall to the earth as acid rain, snow, sleet or dew or are carried on air currents to be deposited hundreds and thousands of miles away.

"Clean" rain, measured out in the middle of the Pacific Ocean, is slightly acidic, because it has mixed with the natural carbon dioxide in the air. This "clean" rain measures at a pH of 5.6.

(A pH 7 is neutral — neither acidic or alkaline. Anything below 7 is acidic, anything above 7, up to a pH 14, is alkaline.)

Rainfall in southeastern Arizona has been measured at pH levels as acidic as 3.7.

"They get really concerned when the pH of rain drops to about 4," said Stromberg. "Only occasionally will rain in the industrial Northeast — what Canada is crying so loud about now — drop below 4, as it has here."

Stromberg's studies began last summer, and he since has measured the acidity of some 40 rains and snowstorms, using a simple apparatus of highly sterilized rain collectors and an electronically-operated pH meter.

Analyses revealed that "the acidity comes from the kind of chemical (sulfur dioxide) that is most dominant in the smelter emissions," said Stromberg. "The samples were full of sulfates, as well as other trace minerals and metals such as lead, cadmium, mercury and arsenic."

Especially significant was the finding that the most acidic rains fell during the summer monsoons — with pH levels ranging from 3.7 to about 4.2 — while the winter rains and snows measured at normal pH levels of about 5.6.

"In the summer, our storms, like our winds, come up from the Gulf, from the southeast out of Mexico and across Arizona, so they are bringing sulfur-laden air and rain from the smelters," he explained. "In the winter, our storms and prevailing winds come from the west, from California, and the rains are relatively clean."

However, Stromberg recorded significant pH level drops to about 4.2 whenever the winds switched from west to southeast this past winter.

"All of this gives us pretty strong evidence it is coming from the smelters," he concluded.

That conclusion was questioned by Burtchin, however.

"This is a very complex problem, and it's always easy to blame the biggest, closest and most visible source," he said. "But this acid could be coming from as far away as Mexico City. We don't know for sure."

Phelps Dodge officials, in recent public confrontations in Douglas over the smelter's lack of pollution controls, have argued that the effects of sulfur dioxide pollution are reversible. There is some question whether there are any adverse health effects from it at all, the officials have argued.

The Douglas smelter has been exempted from all federal pollution control standards because of economic hardship, and now is operating without a state permit. A public hearing on the matter is scheduled for next month in Tucson, and Gov. Bruce E. Babbitt has threatened to shut down the plant if its emissions are not cleaned up.

Meanwhile, a smaller smelter in Cananea, Son., 50 miles southwest of Douglas, also operates without any controls, and is planning to triple its production, and emissions, soon.

And later this year, a new smelter will open in Nacozari, Son., 60 miles south of Douglas, also with no pollution controls.

When that happens, the level of sulfur dioxide in the atmosphere will double the 1981 levels, according to Robert Yuhnke, an attorney for the Environmental Defense Fund, which has filed suit against Phelps Dodge, demanding a cutback in the Douglas smelter emissions

"If that happens," said Yuhnke, "then it's all over for the Rocky Mountain lakes. Acidification, leading to the death of the lakes, will be inevitable, in a very short period of time, about five to six years."

The effects of acid rain falling on southeastern Arizona remain unknown, or at least unproven, said Stromberg.

He believes, however, that the impact is considerably less severe in this arid region, with its highly alkaline soils — which tend to neutralize the acid — than in mountain areas lacking the alkaline defense.

"Our alkaline soil has a great amount of buffering capacity," he explained, "unlike the Rocky Mountains, and unlike our own White Mountains. That's where you are going to see real trouble."

Nevertheless, he believes there is some visible — if unproven — evidence that it is indeed doing some significant environmental damage.

"While the rain does not affect the roots of plants so much, because of the buffering soil, it does affect the leaves of the plants," he explained.

"If you go downwind of Douglas," he continued, "the natural vegetation is gone. The desert there is literally gravel, just bare soil, dead creosotes. It is unbelievable."

The owner of a large peach orchard in Elfrida, 20 miles from the Douglas smelter, blames acid rain for the total loss of his peach crop last summer, and also three years before that.

"It seems that when the plant doesn't run is when we get a crop," said Leroy Myers, who spent 30 years raising fruit for the giant Del Monte Co. in California before moving to Arizona.

Myers is fighting Phelps Dodge in court over the loss of his crops, which PD claims has been due to winter frosts.

Agency response to
National Audubon
Society, Appleton-
Whittell Research
Ranch Sanctuary

1. The Forest Plan will now restrict motor vehicle use to existing roads and trails throughout the Coronado Forest. Education and enforcement are important aspects of implementing this policy. Specific problem areas, such as you have noted, will receive appropriate actions.

2. Visual resource management is addressed in the Forest-wide management prescription on page 41. Specific visual quality objectives for Management Area 8 are shown on page 76 of the Proposed Forest Plan.

3. As you note, many visitors to the area do not understand the function of the Research Ranch and it is desirable to get this information to the public. We will continue to inform forest recreationists about your purposes as the opportunity arises. The basic responsibility for telling the Research Ranch story must remain with the National Audubon Society.

4. Your permit area is a unique opportunity to study the response of hunted populations of animals to vegetative changes. When the range was set aside for nonmanipulative vegetative research, it was clearly understood by all parties that no change in other land uses would occur. To propose a closure to hunting at this point would undoubtedly cause a great controversy. We see no need at this time to propose any closures to the Game Commission.

5. Shooting around buildings, or using other research facilities for targets is illegal under current Arizona law. If you feel that a problem exists in this area, you should contact the local Wildlife Manager. Almost all of the Coronado is currently open to recreational shooting yearlong, with restrictions as imposed by State law. Any proposal to close the area to firearms would require a strong justification.

6. Thank you for pointing out the occurrence of Talinum humile. We will add it to our list of plants likely to be listed. We will continue to study potential reintroduction sites for threatened and endangered plants and animals and to propose transplants where appropriate. We appreciate your support in this effort.

7. Timber harvest levels do not appreciably increase over the planned period. Timber and forest products are managed primarily to enhance wildlife and recreational values. As indicated on page 45 of the Draft EIS, sawtimber volumes remain the same for all periods. While fuelwood harvests only slightly increase from Period 1 through Period 5, they are reduced overall from the current level.

8. Air quality is a function of both State and Federal government, not primarily the Forest Service. While the Forest Service is monitoring air quality, primarily visibility, in and around wilderness areas, the primary responsibility to monitor and act on findings is not a Forest Service responsibility.

9. We appreciate your review and support of our standards and guidelines for managing the Research Ranch and research natural areas.

Arizona • Colorado • Idaho
Montana • Utah • Wyoming

National Audubon Society
ROCKY MOUNTAIN REGIONAL OFFICE
4150 DARLEY, SUITE 5, BOULDER, COLORADO 80303 (303) 499-0219

July 30, 1985

R. B. Tippeconnic
FB #42
300 W. Congress
Tucson, AZ 85701

Dear Mr. Tippeconnic,

Thank you for sending the recent Coronado National Forest plans. Our office and chapters have long been involved with management practices on your forest and have commented on a variety of different issues. They have also participated in trail maintenance as fire tower volunteers, bird censusing, written hiking trail guides (Dr. McMoran's) and used the forests for a multitude of purposes including educational seminars for the public.

First, let me say we feel these lands are extremely important from a wildlife standpoint due to the many Mexican species that frequent them. Recreation, watershed and biological values will increase significantly in economic importance as grazing and timbering diminish. This does not derogate these latter uses but rather recognizes the burgeoning population of southeastern Arizona and their need and desire to escape "urban mania".

Your studies discussed several critical issues like the management of riparian areas, scientific pursuits (physical), biological uniqueness, flora and fauna sensitivities, wilderness diversity, cultural resources, etc. which Audubon believes must form the nucleus of all future planning efforts.

Alternative D best recognizes this option and is the one our Regional Office supports.

Our local chapters in Tucson and Sierra Vista are much more familiar with specific needs, areas, etc. and will comment accordingly.

This office did however want to be on record as recognizing the regional and national significance of the Coronado National Forest.

Sincerely,

Robert K. Turner

Robert K. Turner
Regional Vice President

cc: Roe Danforth

RT/mss

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

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Agency response to
National Audubon
Society, Rocky
Mountain Region

We appreciate the interest and direct participation in management of the Coronado National Forest by members of the Audubon Society. Our efforts are enhanced by the active local chapters, in particular, those in Tucson and Sierra Vista.

We believe our proposed Forest Plan is tailored to be responsive to the future needs of Southwest Arizona and recognizes the recreational and biological values of the Coronado.

All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

National Parks & Conservation Association

1701 Eighteenth Street, N.W.• Washington, D.C. 20009

(202) 265-2717

RUSSELL D. BUTCHER
Regional Representative
SOUTHWEST & CALIFORNIA
Box 67
Cottonwood, AZ 86326
(602) 634-5758

September 5, 1985

0237

RE: Coronado National Forest Plan
Draft EIS

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
SEP 9 1985
RECEIVED

Mr. R.B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

Dear Bob:

National Parks and Conservation Association (NPCA), a private nonprofit membership organization, appreciates this opportunity to comment on the Coronado National Forest Plan draft Environmental Impact Statement of May 1985.

We wish to focus our response upon only the following issues:

(1) Zoological-Botanical Area proposals:

(a) In particular, we enthusiastically commend you and your staff for recommending the special Zoological-Botanical Area status for the biologically rich and scenically magnificent South Fork of Cave Creek Canyon in the Chiricahua Mountains. As a former resident of the nearby community of Portal for a couple of years, I have long wished for some kind of special protective status as this for the South Fork. Actually the entire Cave Creek Canyon complex deserves special protection of its wildlife, habitat, and scenic values. 1 Regarding the South Fork, is there any reason why all of the South Fork watershed--extending on into the Chiricahua Wilderness--should not also be designated as part of the Zoological-Botanical Area? We urge that the entire watershed would offer a far more appropriate and logical special management area, providing a level of protection not covered under wilderness status.

We also strongly support your proposal to convert the South Fork Campground to a day-use facility and to take whatever steps are necessary to protect and restore soil and vegetation values in that fragile site. That area at the end of the South Fork road has long needed controls on where visitors may drive and park their vehicles. 2 We wonder: is the South Fork of Cave Creek Canyon withdrawn from mineral entry? If not, we urge such protective action be taken.

3 (b) NPCA also commends you for recommending Guadalupe Canyon in the Peloncillo Mountains for Zoological-Botanical Area status. As with South Fork of Cave Creek, this scenic watershed contains natural values that are of truly national

3 and even of international significance. We strongly recommend, however, that the Guadalupe Canyon unit be withdrawn from mineral entry and that it be declared off limits to motorized vehicles, to give further protection to the unique natural values of the area.

4 (c) We urge that Ramsey Canyon in the Huachuca Mountains be designated a Zoological-Botanical Area. Even though most of this area lies within the Miller Peak Wilderness, we believe this additional level of protective status for the wildlife/habitat values in the Ramsey Canyon area would be well deserved.

(2) Research Natural Area proposals:

5 (a) We seriously question the proposed major reduction of the existing Santa Catalina RNA from 4,131 acres down to a mere 890 acres--justified in the draft EIS document (p. 117) to "eliminate conflicts with intent of the RNA system by eliminating a heavily used dispersed recreation area along with the trails." It seems to us that the response to certain visitor-use situations has been to recommend an over-inclusive deletion. We urge that a more site-specific deletion be proposed--taking into account that at least some of the dispersed recreation and hiking may not really cause any real conflict throughout much of the proposed deletion area with the RNA's basic purposes. As population increases occur in Arizona, it is almost certain that places such as this RNA will receive greater visitation. Were the deletion response to be applied, as proposed here, we could well see the eventual deletion of virtually all RNAs over a period of time. That, it seems to us, is not the purpose for which these special areas were designated.

(b) We commend your proposal to enlarge Pole Bridge RNA from 460 to 550 acres to bring into the area a worthy representative stand of Chihuahua Pine.

(c) We strongly commend your Canelo RNA proposal--an important evergreen-oak/savannah habitat.

(d) We also strongly support your 1,470-acre Sycamore Canyon proposed addition of thornscrub habitat to the existing 545-acre Goodding RNA. This addition will offer enhanced and worthy protective status to that part of the Pajarito Wilderness.

(3) Wilderness proposals:

6 (a) We are disappointed that the draft EIS does not recommend as suitable for wilderness the BLM's 6,156-acre Bowie Mountain WSA, adjacent to Fort Bowie National Historic Site. Not only does this unit have some outstanding roadless, wildlife habitat, and scenic qualities that deserve protection, but establishment of Bowie Mountain as wilderness would have the additional great value of protecting the mountainous backdrop within the historic viewshed of the nationally significant historic fort site. We strongly urge serious re-consideration of this WSA. We further urge that the 351 acres of private land within the WSA be acquired through a Bureau of Land Management exchange, as is being recommended in numerous other BLM wilderness recommended areas in Arizona and New Mexico.

(b) We favor your recommendation that the BLM's 640-acre Galiuro WSA is worthy of wilderness status--as a natural extension of the existing Forest Service Galiuro Wilderness and The Nature Conservancy's Muleshoe Ranch property.

We appreciate this chance to offer a few comments regarding the Coronado National Forest Plan draft EIS. Please let us know if we can be of further help in any way. And many thanks, Bob, for the opportunity to talk with you briefly today.

With best regards,
Russ
Russell D. Butcher
Southwest-&-California Representative
Box 67, Cottonwood, Arizona 86326

Agency response to
National Parks and
Conservation
Association

1. Zoological and/or Botanical Areas have been proposed for areas where truly unique biological resources are in need of special management emphasis. Most of the Coronado is biologically unique and our overall management emphasis is aimed at preservation of these qualities of the land. The ZBA designation has been reserved for those special areas where more than ordinary management emphasis is required. Several such areas are identified in the plan, and others were considered as suggested by various respondents. In an attempt to limit this special designation to truly unique areas, we have excluded large areas such as the upper Cave Creek watershed. You are absolutely right in your feeling that protection of the watershed above a ZBA is essential to preserve the unique values, however, we feel management as prescribed for the wilderness area will provide this protection without additional special area designations.

2. The portion of the South Fork of Cave Creek that is now wilderness is withdrawn from mineral entry except for valid mining claims existing prior to December 31, 1984. The management prescription for the zoological-botanical area (Management Area 14) recommends mineral entry withdrawals to protect special values of the area.

3. The management prescription for the zoological area portion of Guadalupe Canyon recommends mineral entry withdrawals to protect special values of the area. The prescription also restricts use of motorized vehicles to existing roads and trails. Some vehicle access is desirable so the public can still enjoy the values of the area.

4. As stated before the ZBA designation has been reserved for those special areas where more than ordinary management emphasis is required. In an attempt to limit this special designation to truly unique areas, we have excluded large areas such as the Ramsey Canyon Watershed. We feel the most unique area and area most accessible for the public enjoyment is that located on land owned by the Nature Conservancy. We feel management as prescribed for the wilderness area of Ramsey Canyon will provide appropriate protection without additional special area designations.

5. Perhaps some further background regarding the Santa Catalina Research Natural Area (SCRNA) will help explain why we believe that area should be reduced in size. The SCRNA was the first Research Natural Area ever established. There were no guidelines for establishment and its reasons for coming into being was somewhat blurred. Probably the most important impetus was to protect the area from undesirable development and maintain its wilderness values. As wilderness designation was not considered a viable option, a new kind of designation was developed as Natural Area. Over the years, the research values have become more important while the protection aspect is no longer significant. The SCRNA is within the Pusch Ridge Wilderness which provides a high degree of protection. Current guidelines call for RNA's of 300-1200 acres. Our proposal for the reduced size area contains excellent representation of the plant communities found in the larger area at a broad range of elevations. The RNA designation enjoys a high degree of respect when it is used to protect truly unique values. We believe it is vital to maintain this respected reputation. It is inconsistent with current RNA intent to designate a 4000+ acre RNA, especially where conflicts exist, and have existed for many years. Misuse or extravagant use of that designation threatens the concept of a "Special Area" (i.e., if everything is special, ultimately nothing is special).

6. The Bureau of Land Management (BLM) has reevaluated the recommendation for Bowie Mountain WSA as a result of your comments. The use of wilderness designation to protect the historic viewshed of Fort Bowie National Historic Site is a valid concept. As wilderness, however, BLM must ensure management to preserve the wilderness values of the area in the long term. Because of the two private inholdings and small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private lands within and adjacent to the WSA.

Agency response to National Parks and Conservation Association (continued)

There is a protective withdrawal on 80 acres of public land in Sections 10 and 11 between the National Historic Site and the WSA. The withdrawal permits livestock grazing but does not allow mineral entry or leasing. If protection of the mountainous backdrop within the viewshed of the National Historic Site is determined to be an important issue, expansion of the protective withdrawal can be considered in BLM's upcoming Resource Management Plan (RMP). The RMP is scheduled to begin in fiscal year 1987.

BLM is currently examining the possibility of acquiring the private lands within the WSA through exchange.

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FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

OCT 15 1985

RECEIVED

Department of Fishery and Wildlife
Box 4901 UPB
Las Cruces, NM 88003
October 9, 1985

R.B. Tippeconnic
USDA Forest Service
Coronado National Forest
300 West Congress Street
Tucson, AZ 85701

Dear Mr. Tippeconnic,

The purpose of this letter is to comment on the proposed Coronado National Forest Plan. We appreciated the opportunity for review of the plan and commend you in providing a comprehensive plan and impact statement which facilitated review.

As stated in the Forest Plan, "the diversity of plants and animals found on the Coronado is unique in the National Forest System." This uniqueness substantiates the need for complete, intelligent, and dynamic management of the Coronado's wildlife resources. The following comments and recommendations are based on this premise and are directed towards the Proposed Plan.

The wildlife goals set forth in the Management Direction (page 23) would undoubtedly enhance wildlife habitat and populations on the Forest. However, every goal does not appear to be addressed in the proposed action.

1 One goal mentioned is to improve the habitat and protection for local populations of threatened and endangered species. This goal is contradicted in the proposed action by the statement, "habitat conditions are improved for most species groups except cavity nesters." The coppery-tailed trogon and sulphur-bellied flycatcher are cavity nesters in addition to being threatened and endangered species. The Forest Plan should include a greater emphasis on endangered or threatened wildlife species.

2 Other resource management goals have direct effects on wildlife. As stated in the Forest Plan, "riparian areas will be in satisfactory or better condition by Period 5." Numerous wildlife species, including many threatened and endangered species, are dependent on riparian habitat. The Coronado should adopt an intensive riparian habitat improvement program in order to meet riparian area goals well before the end of Period 5. A recommended management action is fencing to exclude grazing along all riparian areas.

3 According to the Forest Plan 76% of the Forest's watersheds will be upgraded to satisfactory condition by the end of Period 5. Since much soil loss could occur during this 50 year span, along with soil losses from the 24% of watersheds not managed, we recommend that emphasis be placed on the improvement of all watersheds well before the end of Period 5. It is crucial to take more direct action to upgrade watershed conditions and shorten recovery time. We recommend limiting new road construction and implementation of rigid standards regarding location and construction of new roads in order to minimize watershed impact. We also recommend bringing grazing use down to capacity as quickly as possible. The benefits derived from improved watershed condition and a balanced grazing program will greatly benefit wildlife habitat and the Coronado's important wildlife resource.

Several more specific issues mentioned in the Plan require comment including Off Road Vehicle Use (ORV), Resource Natural Areas (RNA) and Zoological-Botanical Areas.

4 With the dramatic expected increase of recreational use of the Coronado due to Arizona's population increase, we feel that ORV use will become more incompatible with other uses of the Forest. Although it is necessary to provide ORV users with recreational opportunity, we feel that this use should be restricted to roads and trails designated for that purpose. ORV use can be extremely detrimental to wildlife habitat, can greatly disturb sensitive species, and disrupt the activities of the vast majority of Forest recreationalists.

5 We feel that the Forest Plan overlooks several prime areas for special management designation. Because of its unique nature, we recommend that Upper Guadalupe Canyon (Douglas District) be classified as a RNA. We also recommend Pine Canyon (Douglas District) be classified as RNA, and Clanton Draw (Douglas District) be classified as a Zoological-Botanical area.

There are many good points regarding wildlife incorporated into the Proposed Action, and it is apparent that the importance of the Coronado's wildlife resources were taken into consideration. However, we hope these suggestions and comments will assist in the development of a more meaningful Plan in regard to wildlife.

Sincerely,

Bob Willging	John Krupovage
Graduate Student	Graduate Student
New Mexico State University	New Mexico State University

Agency response to
New Mexico State
University
Department of
Fishery and
Wildlife

1. As you have noted one of our wildlife goals is to "Improve the habitat of and the protection for local populations of Threatened and Endangered Species to meet the goals of the Endangered Species Act of 1973." As you suggest, we have strengthened this goal by including the word "improve" in specific objectives for T&E species in each management area prescription.

   We disagree there is any contradiction to the above goal. The statement "habitat conditions are improved for most species groups except cavity nesters" is a statement of predicted environmental consequences in the DEIS. It is not a management goal or objective. It is intended for cavity nesters in general and not necessarily those listed as threatened and endangered. It should also be noted that the coppery-tailed trogon and sulphur-bellied flycatcher are State listed species and not federally listed under the Endangered Species Act.

2. The Forest Plan prescribes that at least 25 percent of the riparian area will be in satisfactory condition by the end of the second period and that the percentage in satisfactory condition will increase each year. The statement that 100 percent will be satisfactory by the end of Period 5 does not mean we will wait until then to make improvements.

   A riparian area is considered satisfactory when at least 60 percent of the woody plants are in three or more species; three age classes are represented with at least 10 percent in sprouts and seedlings; and at least 60 percent of natural cover is maintained. Since riparian areas that are now unsatisfactory usually are lacking the young age classes of woody vegetation, it will take about 30 years to establish the two younger age classes once grazing is controlled.

   Because of the linear nature of these areas, it would be very expensive to fence each one. The Forest Plan would attempt to solve grazing related riparian problems first through improved range management practices, and where that fails, through exclusion of livestock. We recognize that some riparian areas are too sensitive to tolerate any grazing. Criteria to help determine when livestock should be excluded have been added to the Forest Plan in Management Area 7.

3. It is stated on page 110 of the DEIS that all watersheds will be in satisfactory condition by the end of the fifth period. This does not imply that every acre of all watersheds are in satisfactory condition, but sufficient areas of each watershed will have adequate cover so that the hydrologic response and soil productivity will be optimized. The 76 percent you refer to is the percentage of total acres of the Forest that will be in satisfactory condition and not a percentage of individual watersheds. The management guidelines for road construction and livestock grazing are exactly what the Forest Plan prescribes.

4. The purpose of the planned policy is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit. Based on your comments, you seem to agree with this concept.

   The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

   Signing or designation of roads or trails open to vehicular use would be by route markers. The intent of this is to use a signing system already established for the purpose of informing the public where they are traveling and which roads or trails are being maintained as part of the National Forest transportation system. Route markers now exist on many roads throughout Arizona and New Mexico National Forests. We recognize there is

Agency response to
New Mexico State
University
Department of
Fishery and
Wildlife
(continued)

much work yet to be done to sign all roads and trails. For this reason, total implementation of the vehicle use policy will take three to four years for the Coronado N.F. However, by establishing the policy now, we feel current and future resource damage can be reduced because people will know that off the road use of vehicles is not acceptable. Direct enforcement of the policy will have to be implemented in stages along with the signing.

5. We agree that identification and designation of appropriate RNA's is important and believe the Coronado N.F. can be justifiably proud of leading the Southwestern Region in that effort. We have more RNAs than any other Forest and with our proposed additions, will have represented all targeted types on this Forest.

Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually precludes or severely restricts most resource uses, including recreational activities.

We have carefully reviewed all proposed Research Natural Areas and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out each special area. We recognize that the entire National Forest is a unique place and worthy of special care.

It is important to bear in mind that the RNA program is national in scope and not limited to National Forest lands. It is not necessary or even desirable to have every vegetative type within the Coronado N.F. represented by RNA's on this Forest. Better representatives may well exist elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

The plant community type of Pine Canyon (Peloncillo Mtns.) area is well represented in other existing and proposed RNAs including Pole Bridge. Upper Guadalupe Canyon is a proposed ZBA and that designation complements the current management direction for the BLM administered outstanding National Area in lower Guadalupe Canyon. An RNA designation restricts uses, including public recreation. Therefore, this designation would not be appropriate for this area.

Zoological and/or botanical areas have been proposed for areas where truly unique biological resources are in need of special management emphasis to accommodate public use and enjoyment of them. Most of the Coronado is biologically unique and our overall management emphasis is aimed at preservation of these qualities of the land. The ZBA designation has been reserved for those special areas where more than ordinary management emphasis is required. Such areas are identified in the Plan, and others were considered as suggested by various respondents.

The values of Clanton Draw are tied closely to the riparian area. The management prescription for Management Area 7 will provide adequate emphasis and protection for this particular area.

0726

CORONADO
OCT 1

NEW MEXICO
WILD TURKEY
FEDERATION
LAS CRUCES CHAPTER

Mr. R. B. Tippeconnic
Supervisor
Coronado National Forest
300 West Congress Street
Tuscon, AZ 85701

Dear Mr. Tippeconnic,

The fact that the Coronado National Forest supports a great variey and abundance of wildlife species has largely been recognized in the planning process. However, I feel it is necessary to comment on some specific points regarding threatened and endangered species on behalf of the New Mexico Wild Turkey Federation.

The Gould's turkey (Meleagris gallopavo mexicana) is a New Mexico state endangered species. This subspecies of wild turkey is rare in the United States. A Gould's population exists in the Peloncillo Mountains, Douglas District, Coronado National Forest. I feel the unique situation of this species was not adequately taken into consideration in the formulation of the proposed forest plan.

I would like to address the issues of critical habitat identification, management prescription and objectives, and impacts from other resource use.

1 Lands classified into Management Area 7 (page 69) include known essential habitats for threatened and endangered species. The delineation of Management Area 7 lands in known Gould's range on the Douglas District is very dificient. Population and habitat surveys indicate critical Gould's habitat may encompass a much larger area than what is identified in the proposal. The entire known range of this species in the Douglas District should be considered for classification as Management Area 7 lands, not just the Clanton Draw area.

2 Management activities and prescriptions concerning Management Area 7 mention turkey management (pages 117-118). Basically the standards mentioned are desireable: retain two turkey roosts/mi^2, roosts will include at least 7 trees with 12" dbh and 30 ft. height, within 1/2 mile of water. However, due to the precarious nature of the Gould's population it is desireable to identify and manitain all potential Gould's roost areas. These turkeys are highly dependent on riparian habitat and increased emphasis on protection and improvement of this habitat, including protection of riparian vegetation from illegal wood harvesting, should be incorporated into the Forest Plan.

3 Other resouce use activities could have a great impact on Gould's turkey. Allotment management plans on the Douglas District should consider turkeys. It is important, and perhaps critical, to develop and maintain ample permanent water resources that are accessible to turkeys. The issue of providing escape ramps for wildlife in cattle watering tanks has been addressed in the plan, and is a beneficial measure.

4 Overgrazing can have adverse impacts on turkeys by reducing escape and nesting cover, and availability of forage. Grazing on the Coronado presently exceeds capacity by 20%. The Forest Plan calls for reducing this excess by Period 3. A balanced grazing management program will greatly benefit and improve turkey habitat. I realize it may be difficult to lower grazing demand to within capacity, but I believe this should be done more quickly, perhaps by the end ofPeriod 2 rather than Period 3.

5 Research has indicatied that beargrass may be an important component of turkey brood habitat. Beargrass harvesting in Gould's range should be restricted during the breeding and brood raising season.

In summary, I feel the Forest Plan has recognized the importance of the wildlife resource on the Coronado. However, I belive the unique situation of the Gould's turkey has not adequately been considered in the plan. I hope that further review of this species will take place and a more comprehensive approach to its management and recovery can be part of the Forest Plan.

Sincerely,

Fredrick C. Dahlquist
President

Agency response to
New Mexico Wild
Turkey Federation,
Las Cruces Chapter

1. Management Area 7 is intended to include riparian areas as well as other areas needing special management emphasis throughout the National Forest. Since much of the habitat of the Gould's Turkey is on dry, upland sites and grassy openings, we do not find it necessary and appropriate to include the entire range in area 7, as you propose. Other management area prescriptions also provide for protection of habitat for threatened and endangered plants and animals.

2. We agree that protection of existing and potential roost sites for the turkey should be a high priority for management. As these areas are identified, steps will be taken to protect them. Fuelwood cutting in all areas, including riparian areas, is closely regulated under this proposal. Enforcement in such a remote area is difficult at best under any anticipated realistic budget level. The standards for turkey roost retention apply to all fuelwood sales regardless of the Management Area where they occur.

3. Forest Service Allotment Management Plans routinely consider impacts on the habitat of all resident wildlife. We intend to pay special attention to the needs of this bird in all plans for the Peloncillos. A current project in the Blair Well area will greatly improve availability of water for the turkeys.

4. We share your desire to get on with the range management program on the Coronado, and will make every effort to bring about balance between capacity and use as soon as possible. In fact, the Forest Plan predicts this will be achieved in Period 2 rather than Period 3.

5. Preliminary studies indicate that there may be some value in retaining beargrass for cover during breeding and brood raising. Harvest levels as permitted by the Forest Service have no detrimental effect on the beargrass plants, and probably stimulate production. Any plans to harvest this renewable resource will consider turkey habitat factors.

0012

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CORONADO N. F
JUL 22 '85

FS		RES		LA		B	
LMP		BAF		ARCH		[illegible]	
AO		PER		WL		SV	
ENGR		AS		WS		S	
RGE		CR		SLS		SC	
RLT		LE		DISP		MARTC	
FIRE		RECP		PROJB		COMM	

Dear Sir:

Its been a long time since we had a visit.

I never new you had made Supervisor, I know no better man.

I used to be in Willcox on G Rch. & Dick Ellis Rch. ect,

I read parts of your book that was mailed to me.

1st let me get to the point. Here they say ~~we~~ need to get your advise because the land belongs to you also, thats a right down un true, there is no Federal land belongs to any one of us.

The President & his staff can do any thing they desire to do with it, and you people & BLM knows that, that what you all, or afraid off.

It may be turned into State land & thats exactly where it should be.

For the BLM kids to take over the Forest is Bull shit, they can't even take care of what they got.

All they do is stire up trouble & couse more pat. land to be

#

Posted, ect.
We or tired of there acts.
As for as getting Court orders to enter threw, that won't hold water, there is no parts of the Forest or BLM that can't be entered threw there on lands.
Shell we get a court order to go threw your home, because its the shortest way to my house in the back. Hell know, I would be put in jail & Court would be pending of 2nd degree.
I am afraid before Ariz. is all over, you or going to see blood shead, because these Ranches or not going to give up whats been in the Ranch for 100 years. It not right & you boys know that.
Here we got all these people Ford pardon & got off free & people from all over the East move in here & takes over, we don't wont cattle, or wont hunting, we don't wont Cattle, or wont hunting, ~~the~~ they wont what they call Clean cut people,

III

long hairs, pot smokers ect.
Its not the good people, its the ones the Gov. is feeding + they got all this time on there hands. to make problems
If they where working hard - you would not see this.
you guys sound like Carter, set back and try to let people make the laws + tell the Federal Gov. what to do.
Its like or great President Ragen said the only way I know when I am doing it right is when they march + riot at.
He is so right.
Its like the Mormans, what makes them so right is because the people fight it.
You know your self, we can be lead by Satin, a lot easyer then we can by the true word of God.
I would like to take one day + go around with you + prove to you what would happen if the cattle was taken off, I have plots of 50-years thats never had a cow of any kind on for proof.

IV

I am 100% for the better ment of or Gov lands But I am not going to listen to a school Boy out U of A bring a book & tell me we got to do this & that.

It won't work & never has.

Because what works ~~today~~ This ~~year~~, won't work next, because of the change in Rain fall.

Sure my Forest, I should of a permit Dr. Heller M.D. P.C. now owns, is in fine shape, because of me, I clean out all waters, clean the trails & never allow to many cattle it any one given place.

I like to leave ¼ or more of the old feed

Or deer ~~are~~ will protected & doing better then ever before, I keep all Coyotes Caught & Shot out. they where killing all the Baby Deer for years. But know more.

you or a good man & I can talk to you.

The Gov. does not need all these Kids on the pay roll. its foolish, we don't need all these fine offices & each man a pickup Forest & BLM eather its not the way to run any job.

The State of Ariz. look at it, Gas tax 7½ & auto Tax #12~~00~~ to 1500. before you can drive a car off the lot.

V

Grazzing Fees plum out of reason, But all these men + Cars hast to be paid for, so the deal is, take it from the poor man.

The Gov. funds needs cut more or nearly out.

There is a lot of people that has Ranches, that dosen't know to keep there salt off the lower ends + keep the cattle pushed back + waters open up.

But us Bolands or not that way, or father trained us better than that, he taught us to have respect + obey the laws of or land.

I am retired, sold out my Ranch because I could see real trouble coming + I did not won't murder hanging over me the rest of my life.

I am here to stay + will hold my right as an Arizonan, Born + rared here.

Why change any thing, hell its working like it is.

The Forest + BLM is constantly stirring up new deal to cause trouble for others They or never satisfied, like + old rich women.

over,

II

Here is and Example, I been a Vary successful Race Horse Gambler, because I work just operite from the other people.

I feel if they or right ~~there~~ would be no Gambleing at the Race Tracks, they would be broke.

How many big Winners or they, Vary few because ever man followes the others Ideals.

This is the same thing.

Work just appasit from all that Invironmentlist Group & you will be right.

Note why 90% of the office Holders don't stand up & fight for the right thing? because they or afraid of there jobs & not getting the Votes next year.

Thanks to president Ragen, he stands up & says his peace, & look at the Respect he has gained.

Senator Goldwater, look what a good man he is.

I do not beline in trying to please this race of people of today.

Yet we have lots of fine young men that is in Uniform & willing to give his life for his Country.

Sincerely
Albert C. Noland

VII

If the people owns this Gov. land, then let me build a house on it & Put a fence around it & see who owns this Gov. land.
Its foolish to tell the public that, or make such a statement.
You take Who's Canyon Cabin, the man was forced to clear it all out & move, right around the hill at Hilltop, White-tail Canyon, there is the page Cabin the River House, now belongs to a man by the name Rick Toper, they or on Forest land & they or still there
Don't you think everyone out to be treated the same?
"over"

VIII

Since we have back packers & Bird Watchers don't you feel there should be a fee. Fees of $25. a year to do so. We or charged to run cattle & Hunt on the Forest.
All back packers does is distrub the wild life & the nesting of wild Birds ect.
We need to throw those Books away & use comon sence, If you don't know, get some of those old Boys like me to lead them around & show them the truth & how foolish there ideals or. The people you or agreeing with or, people who Pays no tax, spends there money in Mexico, & uses foreign tools. And get trips to fight & tell us natives how to operate

I

Here is more I must say before mailing.

Lets use good judgement & let me tell you some things.

All this farming started with flowing water 1900 to 1936 & went from there to 400 ft. pull.

Same in Texas & allover.

With out moisture pushing up all time these sprinkles of 2" rain will only make a hard crust on top.

No Snow any more to open up the soil, Cattle is not the blame for any thing.

All the Brush has moved in, because of the Lords plan, to re build the soil.

People have taken all the good out same with cotton Farmers, till they Can't grow any thing.

Our soil is wore out from years & lack of rain & Snow.

In the next 50 years we won't have a Forest or nothing, because of or today school Boys running the operation. (over)

IV

The Forest needs burned off, like
it was years back. thats why the Lord made lightlin
then you would see more water
prettyer trees & nice thing.
We got all this Brush that died out
because of being to heavy of growth.
& its took up all grass & water.
The BLM I can assure any man
they flat don't know what they
or doing, but spending or Tax Dollars
foolishly.
I can see it & so can you, we
americans or in for a World War III
We can ~~can~~ not feed & take care
of todays population for long.
These people will need land to
build homes on or sleep under a tree.
You may feel I don't know, but I
Can assure you I do.
I have been here with the old timers
56 years & seen it good & Bad.
Years ago we got lots of snow &
that kept the ground open up.
Last Winter we got worlds of rain
& snow & this sping it was dryer then

-III

Its been in 20 years.
Why I do not know.
There is a controll on ever thing.
I could haul you around & show you
all those BLM. projects & prove my
point
All this land should forsure be
turned over to the State of Ariz.
When you mention the public
in General, do you relize who
you or talking about?
I am all over & meet lots of
people, these people that want power
over the Gov. lands ect, or not sound
people, most or from the East, they or
against Cattle, Game Hunters, ect.
The reason we have such people
is just because, the Gov. & or Leaders
do not say hell no, & put a
Stop to Animal rights & the drags
on the Bal. of the good people
you or fooling with these Terrest
Groups now days, that studys the
over throw of or Constution & rights.
And you people or not smart enough

IV

to see it & plays right in their hands to ever thing.

All these trails & roads you talk about, what about the wild Game; shall we just destroy all wild life, just so the Hippies etc that won't work to come out & hike & run all game off here & there.

If those people was put off of Welfare & had a job, then there wouldn't be time for such.

Thats what I am trying to tell you is the ones that wants all power & rights ~~Our~~ people that pays no tax, no School tax & live off the tax Dollars of us honest people.

You watch all over & see who has the most to say at your meetings & who & where they came from.

Its Groups leaders who is up to no good at all, we Ranchers used to work & get along fine with Forest, BLM & State but now they wants rights to come & go on or pat. land & thats will be when the Shooting will take places.

any time the Gov. offices try
to take over or Pat. land + homes
ect. just so the bikers + campers
can come + go, thats out + will
lead to the worst problems you ever
seen in life.
They don't need Roads + excess
here + there + neather do you.
Most of you travels by air any
way a pickup is to hard on a
man now days.
Let, let the fires Burn, and
let trails + Roads alone, do
vary little up keep. you will
see its the only controll you get to
protect or Deer, Lions, Bear + Game.
I had a lot rather see a Deer on a
hill side, as I had a long hair
walking around there.
We can't. let these Groups take
over at all, Now is the time to
conttroll things, not 10. years from now.
How much time do you have to hike
a picnic? I will answer, only maybe
10 days out of the year, because you

or hard at your job & taken care
of it.
You got lots of people that has
3 & 4 pickups out now days & use the
same plates for them all.
But to ever turn the Forest over
to a BLM Management is another
stept to failure & sets us back another
20 years.
Would like to set a date
& Visit with you over here
& talk & show you a lot of
things of int.

Yes, I am vary much interested
in or game & my land where I
been for 56 years & my Dads
1898 he took this up. you think
I am going to listen & let some outsider
Push me around. "know".
You heard this old song, this land is
my land. written some 40 years ago.

0500

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 1 - 1985
RECEIVED

R. B. Tippeconnic
Forest Supervisor
Tucson, Arizona

Sir:

This is a reply to the Proposed Forest Plans. I am Earl Noland, of Portal area. I feel that I should make some comments since it directly involves my lifestyle and living. I have compiled a comment for each
1 of the areas, starting on page one.
Benefits: NFMA Act has some good ideas, some will work here and some will not. I would hope that the Forest management team would except
2 andor talk over some of the needs for specific areas. I suggest that the majority of the picnic areas around the larger citys be up dated to accomodate those people, so that no drastic changes would be done in the Chiricahua Mt. area. It is my beleif that if more roads, trails and picnic areas are opened that it is an inventation for vandalism not only to Forest Property but private as well. I could name you many instances where it has happened, but I am sure that you are aware of it.

1 Forest belongs to everyone:
This is a fact. It is Goverment land and was set aside as Forest Service Land to be managed by such. On the outside it looks like in some instances there is a laxity in management. By this I mean things suggested in different places could have already been implemented where by it would not have not been necessary to ask the opinion of the nation. I believe that there is to much imput by the different factions. This only makes the Managers job that much more difficult. I am of the opinion that the draft and statement is an appeasement and cannot be implemented as a whole. This is due to the different locations, types and ect. I am against the expense occured in this type of questioneer. The money could have been put to better use in each area as improvements.

3 Wilderness: This is only a word. I have always been under the impression that wilderness meant an isolated place reachable only by walking and was made by nature not man.

4 Visual Resources:
Natural beauty is important. It can be utilized by all from a vantage point or by glassing the area. It would not remain that way if more access was created. I have the permit to graze cattle on Mavrick Peak. This area since the inception of Forest has continually grown up in brush and trees of the undesireable types. It should be burned in some places to allow the return of grass and springs. This area is only suited for wildlife and grazing. It is nice to look at from a distance due to the shape of the mountain but looses the look as you ride through it.

5 Wildlife and Fish.
With proper burning some of the areas that are currently assesable could be reverted to fishing. It would also improve the areas for wildlife.

Range:See reverse

Range:

6 This is one of my main concerns as I do have a grazing permit. I am very familar with the Chiricahua Mts as my ancestors homesteaded here in 1898. We have since the inception of the Forest Service grazed cattle in the same area. The only difference between then and not is the overgrowth and rainfall. This area is in need of burning to rid the area of some of the undesirables and thereby leave more water for wildlife and grazing stock. Recently burning has been recognize as a useful tool in land management so would reccommend that some areas be looked as passible sites. Trails and water improvement should also take place. I suggest that the permitee be given the necessary supplies to make the improvements.

Soil-water Resources:

7 The statement of little opportunity is not a true statement in all instances. I have seen many seeps and springs dry up because of overgrowth.

Land Use:

8 If there is a suitable area that will accept the things reccommended and not cause adverse problems to sight,grazing,timber and wildlife then it should be considered in some instances.

What should we do:

9 The language in the proposals are designed to do only the specific things mentioned. There are some good in all the plans that would work in different areas and the plans should be flexible for each area not a set rule for all.

Summary:

1 I would like to go on record as stating that the total expense incurred in working up the draft and statement would probably have gone a long way in correcting the deficiencies on Forest lands. I again would like to stress that by doing so creates a problem for all concerned. I believe that those in charge of specific areas should stand up and make a statement to those advocating all the changes that when not possible or feasible that it is of no value and save the time and money for those things necessary.

I am very pleased with the way that the Forest Service has treated me in the past and I expect when the cards are on the table it will remain the same.

Thank you,
Martin E Noland
Martin E Noland
Box 21
San Simon, Ariz. 85632
(602) 845-2367

Agency response to Martin Noland

1. The National Forest Management Act (NFMA) of 1976 requires the National Forests to do integrated land and resource planning at the Forest level. An integral part of this planning is the public involvement. While the initial cost of this effort may seem high, the long term benefit should be a more workable plan because all the diverse interests have had a chance to express their concerns and desires. In 1907 Gifford Pinchot said of the National Forests: "There are many great interests on the National Forests which conflict a little. They must all be made to fit into one another so that the machine runs smoothly as a whole. It is often necessary for one man to give way a little here, another there. By giving way a little at present, they both profit by it a great deal in the end. National Forests exist today because the people want them. To make them accomplish the most good, the people themselves must make clear how they want them run."

   The role of Forest Service managers is the same as it has always been. That is to insure the land and resources are managed within their natural capability and to insure that future resource opportunities are not foregone.

   The Forest Plan is intended to establish overall management direction and emphasis for the various parts of the National Forest. Individual project proposals will still have to be evaluated on a case by case basis as you suggest.

2. Most of the available recreation sites near larger cities are already operating at or near their capacity, especially at certain times of the year. Some new sites are proposed throughout the Forest to accommodate the expanding population and demand for outdoor recreation. Other agencies and landowners will have to share in meeting this total need.

   The transportation system for the Coronado National Forest is considered to be adequate at this point. Road management emphasis will be on maintenance and reconstruction of existing roads. The Forest Plan predicts only ten miles of new roads for fuelwood access will be needed during the life of the Plan.

   We do not believe these proposals themselves will directly lead to more vandalism. We do recognize that vandalism is a potential problem and will continue our education and enforcement efforts to reduce this potential.

3. The Wilderness Act of 1964 defines wilderness as follows: "A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value."

4. We agree that natural beauty is important. However, it must be considered not only at a distance as a background but also must be considered up close as part of the foreground. You are correct in that the density of woody plants has increased on parts of the Forest. Vegetative diversity is an important part of natural beauty and prescribed burning is a tool we plan to use to create and maintain this diversity.

5. We agree prescribed burning will enhance wildlife habitat and plan to use it for that purpose.

Agency response to
Martin Noland
(continued)

6. We do plan to use prescribed fires as a tool to manage vegetation and provide forage for wildlife and livestock. Other range management improvements are planned including stock trails, fences, and waters. Under terms of the Forest Plan and the grazing permits, the permittee and Forest Service both have improvement responsibilities. In many cases, improvement projects are a joint venture where the Forest purchases the materials and the permittee provides the labor. We greatly appreciate this type of cooperation from the grazing permittees.

7. The statement referred to means there is little opportunity to increase water yield from the Forest as a whole. You are correct in that there are some areas where local increases in surface water yield might be realized with reductions in the density of woody species.

8. Any proposals for specific land uses (special uses) must be subjected to an environmental analysis to determine their suitability in relation to other resources and uses.

9. We agree that all of the alternatives presented in the DEIS have their good points. The proposed Forest Plan is a blending of these good points.

October 11, 1985

Received
10/11/85 JET

0709

To: Mr. R. B. Tippeconnic
Forest Supervisor
Coronado National Forest.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 11 1985
RECEIVED

This letter is in response to the Draft Environmental Impact Statement of the Proposed Coronado National Forest Plan (PA).

I support the PA as a whole. I know multiple use has to be emphasized under the constraints of the present budget.

1 However I am concerned about the range management aspect as it affects livestock grazing. By period 5 the PA will have the least amount of AUM's as compared to the other 5 alternatives This is supposedly going to be offset by the intensified management which will then improve range conditions. How this will be enforced to my concern. Right now there is a great deal of variation in range conditions from one permit to another. Also under the PA, riparian areas may be fenced off. Has this been taken into consideration in

calculating the AUM's?
I believe law enforcement should be
increased or in the very least continued
2 at its present level in regards to
camping, hunting, recreational uses
and mining. I support the restriction
of vehicles to existing roads. I however
3 feel that ATV's (all terrain vehicles) have
no place whatsoever on the Forest as
they conflict with all other uses of the
Coronado National Forest.

Being part of a ranching family I am also
concerned about hunters and their use of the
range (i.e.: cutting fences, shooting at water tanks
and windmills, driving off the roads, messy
campsites and camping near water holes).

Maybe the Forest Service could get together with
the Game and Fish Dept and provide these hunters
with a pamphlet on the laws and purpose of the
Forest when they got their hunting permit. This
would be an inexpensive way to try to "educate"
4 these hunters. (I spoke to one who thought "OPEN
RANGE" signs meant you could do anything on the
land!). I appreciate being given the opportunity
to comment on the PA.

Cecilia Moon
1419 E. Adelaide Dr
Tucson, Arizona
85719

Agency response to Cecilia Noon

Thank you for your support of the proposed Forest Plan.

1. Two basic factors influence the ultimate grazing capacity of the Forest (within the limitations of climate and soil). First, is the overall allocation of land to various products and uses. If we increase use of some resources, the production of other resources may decrease somewhat. The other significant factor is the amount of investment in range improvements. In developing the Forest Plan, a constrained budget was used in an attempt to arrive at a reasonably attainable plan of management. For this reason, the preferred alternative shows a relatively low range output in the short run. Application of management prescriptions is expected to result in a gradual improvement in productivity.

   As in the past, we will analyze each grazing allotment individually and set capacities based on on-the-ground observations. AUM numbers displayed are not targets, but merely estimates of the results of applying this plan. No individual permit will be adjusted for the purpose of meeting these estimates, but only as justified by management level and on-the-ground conditions.

   Riparian areas are highly valuable for many uses. Most wildlife species in the southwest prefer these habitats, when available. Some are totally riparian dependent. Recreationists also tend to focus their activities on these very inviting areas. The combination of water, shade, and lush vegetation is also very attractive to livestock. There are many examples on the Coronado and elsewhere in Southern Arizona to indicate that good range management can result in grazing these sensitive areas without loss of riparian values. The proposed plan calls for careful management of the riparian in the presence of livestock. Where this fails to preserve riparian values, stock will be excluded. We anticipate that the result will be that most such areas will remain open to livestock, with more careful management than in the past. Extra sensitive and unmanageable areas will be closed to grazing.

2. The Forest Plan will utilize law enforcement as one tool to manage all resource uses.

3. The purpose of the planned policy is to continue vehicular recreational use, including use of ATVs, on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

   The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

   At this time, we see no justification not to allow use of ATVs on established roads and trails. If specific problems arise due to their use, we can take action under current regulations, on a case by case basis.

   Regardless of a given vehicle management policy, we recognize there will always be some individuals who will disregard established regulations. Teaching responsible use of the National Forests and its resources is something every individual can assist us with.

4. We continue to work closely with Arizona Game and Fish Department in the area of hunter education. Your suggestion of some type of handout for the hunters is certainly valid. Recently, the University of Arizona published a brochure entitled Range Etiquette, which should be helpful in this effort.

0733

Mrs. Horton E. Noon
Patagonia Road HCR Box 205
Nogales, Arizona 85621
October 10, 1985

Mr. R.B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, As 85701

Dear Mr. Tippeconnic:

I support the PA (Proposed Action) plan of the Forest Service within the anticipated budget, with emphasis on cattle grazing and good range management.

I recommend that vehicles be allowed only on existing roads and that the use of ATV or three wheel bikes be prohibited.

I believe that the existing laws regarding camping, hunting, recreation and mining be vigorously enforced.

Sincerely,

Muriel B Noon

Muriel B. Noon

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 15 1985
RECEIVED

Agency response to Muriel B. Noon

We appreciate your support of our Proposed Forest Plan.

Under the Forest Plan, motor vehicle use would continue on existing roads and trails. Travel off road would not be allowed except by permit. All terrain vehicles (ATV's) or three-wheel bikes would be permitted on existing roads along with other motor vehicles.

The Forest Plan calls for continued enforcement of all appropriate laws and regulations including those pertaining to recreation use and mineral development.

0687

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

OCT 8 - 1985

RECEIVED

October 5, 1985

R. B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, AZ. 85701

Dear Sir,

1 I compliment the Coronado N.F. staff for the effort put forth on the May 1985 Draft Forest Plan. However, I do not support the Proposed Action. The pro overgrazing and big game hunting biases remains very visible in the Proposed Action. I support Alternative D as the alternative that offers the best balance between preservation of the resource base and multiple use of the forest.

2 The Proposed Action does an injustice to wilderness. All three of the Forest Service WSA's: Bunk Robinson, Whitmire Canyon, and Mt. Graham are excellent wilderness candidates and should be recommended (I get the impression you feel"there is enough wilderness already" and didn't fairly judge each area on it's own merits.) Congress makes the final decision, but you are required by law to judge each area on it's own merits. The four BLM areas that you reviewed all have excellent wilderness qualities and should be recommended. I feel your "anti-wilderness" attitude carried through to them also.

3 All through the plan you refer to manipulations that will benefit wildlife, but the natural diversity is doing just fine without your manipulations. A drastic reduction in grazing would best provide natural wildlife diversity. And keep the cows out of riparian areas. Your recommended manipulations (i.e. woodcutting) would primarily help deer (and cows)which are more dense than their original levels.

4 You do not adequately address watershed. You ignore recharge of
the groundwater aquifier. 5 You place full market value on grazing
AUM's, but a small fraction of of the full marketvalue on water.
Can you buy water in Tucson for $ 39.60/acre foot?This biased your
proposal in favor of grazing. Improving watershed by the year 2000
would promote community stability far more than permitting the
continuance of overgrazing. Assigning a zero benefit value to

5 overgrazing instead of a negative value (or cost) further biased
6 your model for grazing over watershed values. Your projected use
of pesticides and hebicides threaten groundwater quality.

In summary, I recommend that Alternative D should become the
Proposed Action. Your plan should be revised to reduce grazing
and fuelwood harvesting. No new roads should be built to accomodate
fuelwood harvesting. The plan should be revised to adequately
address groundwater quantity and quality, and manage for
7 natural wildlife diversity rather than it's current big game bias.
You should modify your FORPLAN input market values for grazing
and water as listed above. I do applaud your concern for riparian
areas.

Sincerely,

Jim Notestine

Jim Notestine

P.O. Box 461
Sonoita, AZ. 85637

Agency response to Jim Notestine

1. All alternatives, including the Proposed Action, would balance livestock grazing capacity and permitted use by the end of the second period after implementation. Therefore, we fail to understand your statement about "pro overgrazing" being visible in the Proposed Action.

   It should also be noted that Alternative D gives substantial emphasis to managing game animal habitat as does the Proposed Action. See Table 3, page 24, of the DEIS.

   All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C, project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives, as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

2. We take exception with your suggestive comments that the Coronado National Forest has an "anti-wilderness" attitude and that we did not fairly judge each wilderness study area on its own merits. The National Forest System is mandated by Congress to develop and administer the renewable surface resources for multiple use and sustained yield of the several products and services obtained therefrom. Wilderness is only one of the many resources to be considered when making management decisions for various parts of the National Forests. While it is true each wilderness study area should be judged on its own merits, they also must be judged in relationship to other parts of the National Forest as well as adjoining lands.

   Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

   Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

   The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates

Agency response to
Jim Notestine
(continued)

there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

3. Again it should be noted the basic mission of the Forest Service is to provide multiple use of the various resources. We agree that nature does eventually provide for diversity if things are left entirely alone. However, nature's way of providing diversity is often slow and devastating, especially where man has already had an influence upon the natural diversity. The choice is one of waiting for and accepting the risks inherent with nature or creating the desired diversity through planned management actions. Practices such as fuelwood harvest not only create diversity but utilize an available resource for man's benefit. This activity would affect approximately 6250 acres or less than one percent of the Forest within the Plan period (10 years).

Agency response to Jim Notestine (continued)

Plant diversity is currently decreasing, because of invasion of woody plants into the desert grasslands of Southern Arizona. This is the result of a complex mix of factors including climate and man's past influence. Limited efforts are proposed in the Plan to slow this invasion. If some measures are not taken, many acres can be expected to deteriorate to a desert shrub type, where highly productive grassland habitats once occurred, and woody species will continue to increase in density in the woodland and brush types. We cannot accept the hypothesis that reductions in livestock grazing alone will benefit wildlife or diversity. Active improved management of the range resource is also necessary. This is the reason the proposed Forest Plan uses a combination of livestock reductions and improved management to resolve any overgrazing problems.

Although deer numbers do show some response to our limited habitat changes, their numbers fluctuate more due to factors such as climate, disease, numbers of predators, and hunting pressure.

We certainly agree that riparian areas need special management consideration, because they are more sensitive to grazing and other land uses than the surrounding land. Because of the linear nature of these areas, it would be very expensive to fence each one. The Forest Plan would attempt to solve grazing related riparian problems first through improved range management practices, and where that fails, through exclusion of livestock. We recognize that some riparian areas are too sensitive to tolerate any grazing.

4. We disagree, goundwater recharge is not ignored. See page 108 of the DEIS. Analysis showed that no alternative significantly affects the Coronado's contribution to groundwater recharge.

5. The benefit value used for water yield is taken from the 1985 National RPA analysis. All benefit values are established based on the common assumption that use is on-site, without further processing. For example, an AUM is valued as an animal on the Forest, not on the basis of the price of hamburger or steak in the supermarket. Timber is not valued on the basis of the cost of milled lumber. As you can see, both grazing and timber would have much larger values if the benefit values were based on the prices charged in Tucson stores. The same is true for water. The cost of delivered water in Tucson includes the costs of collection, storage, and delivery. We believe the relatively low value for water we used is appropriate for forest planning.

   The market value used for water is for total water yield. None of the alternatives affect water yield. Therefore, water yield benefits are the same for each alternative regardless of the benefit value used per acre foot. The water yield benefits have no effect in the planning model (FORPLAN) on the selection of management prescriptions or alternatives.

   The effects upon resources because of past livestock grazing problems are reflected in the resource yield predictions used in the planning model. In addition, a negative benefit was assigned to soil loss which is a reflection of watershed condition. This negative benefit has an insignificant effect on total benefits because all alternatives would resolve any overgrazing within 20 years and provide significant improvements in watershed conditions within 50 years or less.

6. We disagree, the projected use of pesticides do not threaten groundwater quality because all proposed uses of pesticides will be within manufacturer's and EPA guidelines designed to protect groundwater as well as surface water. The planned use of pesticides is actually very limited. Instances where they might be used are shown on page 51 of the Draft Forest Plan.

7. We see no rationale to reduce the livestock grazing and fuelwood harvest levels of the Forest Plan. The predicted levels of resource output are within limits of what can be sustained as a result of applying management direction to meet goals and objectives for all resources, including wild-

Agency response to
Jim Notestine
(continued)

life and recreation. Livestock grazing is already estimated to be as low as or lower than the other alternatives. Fuelwood harvest is estimated to be less than present levels.

Fuelwood harvest on the Coronado National Forest is an activity used to meet other resource objectives such as providing recreational opportunities and providing wildlife habitat. Some access roads are necessary to manage the stands to meet these resource objectives. Only ten miles of roads are planned during the Plan period. These roads are located and designed to meet multiple resource objectives.

As stated in response number 4, ground water has been addressed in the DEIS.

Maintenance of natural diversity will be an important part of managing the Coronado National Forest. Direct vegetation management activities are estimated to affect only 2998 acres (less than one percent) of the Forest each year. See Table 19, Draft Forest Plan. All of these actions have a common objective of creating and sustaining diversity while accommodating man's use of the various resources. Game animals such as deer and javelina have always been a part of the natural diversity.

We see no need to modify the values for livestock grazing capacity or water yield as discussed in response number 5.

Thank you for your support of the management direction for riparian areas.

0196

RECEIVED

Dear Sirs:

I Am writing in regards to the Draft EIS for the Coronado Nat'l. Forest Proposed Plan.

After reading the entire plan, I find that the Alternative D best sums up my feelings.

I feel that the emphasis should be on recreation, watershed and wildlife, plus the special designations; for wilderness, RNA's, ZBA's, and the primitive recreation areas.

1 - As an owner of An ORV I have seen what the unrestricted use of these vehicles can do to the wilderness, that is why I think the restriction of motorized vehicles to designated roads and trails in the PA And D is very essential for the protection of the wildlife and soils

2 The recommendation under D for wilderness status to all FS And BLM WSA's is also important if the Forest is to have as you say A more "natural character.

3 Alternative D seems to also have A high level of recovery effort for Threatened & Endangered Species, Along with nongame animals.

4 The plan in D to eliminate all livestock use in riparian Areas with perennial water, along with the over all reduced management activity which would result in A shift from desert grassland to desert scrub would probably be beneficial to over all plant and animal diversity.

5 I find the PA is the better idea As far as the RNA's are concerned, but I think that D would be A better choice for the ZBA's.

6 As far As the Mt. Graham development is concerned, I have no comment At this time. I would Appreciate A copy of the DEIS when it is released in Oct so I can make A more educated analysis of the situation.

Thank you,

John Pampein

Agency response to
John F. Pamperin

1. The purpose of the planned policy for managing motor vehicles is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

   The policy is not an attempt to "ban" off-road vehicles (ORVs) or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

2. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

   Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

   The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

   The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatnened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

   Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wildernesss experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

   The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas.

Agency response to
John F. Pamperin
(continued)

The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

3. As you suggest, Alternative D has a strong emphasis on the recovery of Threatened and Endangered species and management of habitat of nongame animals. The Forest Proposed Plan also calls for a significant effort in this area. Wildlife habitat has long been a primary concern of the Agency. All projects and plans are closely coordinated with wildlife needs and in consultation with the involved State wildlife agencies. The Coronado Plan devotes a great deal of effort to plans to preserve or enhance excellent wildlife habitat of the area. A source of pride is the strong consideration for nongame and endangered species.

4. We certainly agree that riparian areas need special managment considerations, because they are more sensitive to grazing and other land uses than the surrounding land. Because of the linear nature of these areas, it would be very expensive to fence each one. The Forest Plan would attempt to solve grazing related riparian problems first through range management practices, and where that fails, through exclusion of livestock. We recognize that some riparian areas are too sensitive to tolerate any grazing. Criteria to help identify these extra sensitive areas have been added to the Forest Plan in range management standards and guidelines for Management Area 7.

   You are correct in the assumption that Alternative D would result in a vegetation shift from semidesert grasslands toward desert shrub. We cannot agree that this would cause a beneficial increase in habitat diversity. Without proper watershed and range management, shrubby species would quickly invade highly diverse and productive natural grasslands. This would cause a significant loss in diversity. You will note from Table 60, page 108 of the Draft Environmental Impact Statement, that the most significant loss of diversity would occur under Alternative D.

5. Zoological and/or botanical areas have been proposed for areas where truly unique biological resources are in need of special management emphasis to accommodate public use and enjoyment of them. Most of the Coronado is biologically unique and our overall management emphasis is aimed at preservation of these qualities of the land. The ZBA designation has been reserved for those special areas where more than ordinary management emphasis is required. Such areas are identified in the Plan.

6. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as it was for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

0009

4231 East Stanford Drive
Phoenix, AZ. 85018
July 16, 1985

Forest Supervisor
Coronado Natl.Forest
300 West Congress
Tucson, AZ. 85701

Subject: Draft Environmental Impact Statement -- CORONADO NATIONAL FOREST PLAN

Gentlemen:

1 Of the alternates listed, either "A -- Current" or "D" with its emphasis on a natural environment are, of course, preferable to any economic development, livestock grazing amplification or trying to satisfy all interests--an obviously well-nigh impossible goal.

2 It is well-established that fees for grazing are pegged absurdly low; as a source of revenue, this practice is a two-edged sword and should be cut baCK, NOT EXPANDED.

3 Allowing extensive mining, with its concommitant roads, noise, litter, etc., is extremely undesirable and should be completely forbidden.

Large-scale campgrounds mock the very idea of wilderness and preserving a natural habitat for both animal and vegetable wild life.

Please, do not turn Coronado into Disneyland of the desert regions. As Americans, we should most mightily strive to keep some small segments of our much-abused lands pristinely intact.

4 Thank you for soliciting my opinion. Please send me the Mt. Graham EIS. Thank you.

Sincerely,

Mrs. GeneAnne Parker

(MRS.) GENE ANNE PARKER

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
JUL 18 1985
RECEIVED

Agency response to
Gene Anne Parker

1. All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C, project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

2. The question of livestock grazing fees is outside the scope of this Plan. The Forest Service and Bureau of Land Management recently conducted a study of public land grazing fees. A joint agency recommendation was made to Congress in 1985. Congress will now decide on a new fee schedule.

3. Development of mineral resources is a legitimate use of National Forest lands. As such it has to be considered along with other uses and activities. Mining activities are done under conditions specified in an operating plan designed to minimize impacts on surface resources without unduely interfering with the miner's legal right to extract minerals.

4. We look forward to any comments you may have once the Mt. Graham Draft EIS is released for public comment. The public comment period will last at least ninety days as was the case with the Forest Plan EIS. We have included names of those requesting the Mt. Graham DEIS on our list of those to receive the document.

5122 East Citrus Street
Tucson, Arizona 85712
September 18, 1985

0680

Mr. R. B. Tippeconnic, Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
SEP 20 1985
RECEIVED

Dear Mr. Tippeconnic:

I would like to comment on the Proposed Coronado National Forest Plan.

1 Alternative D is most preferable because it will preserve the value of the national forest. Alternatives emphasizing consumptive uses, such as timbering, grazing and mining are no longer acceptable.

2 Riparian areas in all parts of the Coronado should receive more protection from overgrazing. West Turkey Creek in the Chiricahua Mountains is an example of the terrible impact caused by too many cattle. Rock Creek, in this same area, is another example.

3 Non-consumptive, recreational uses of our national forests should have top consideration and priority.

Sincerely
Dorothy Hines Pelech

Agency response to Dorothy Hines Pelech

1. All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

2 We certainly agree that riparian areas need special management considerations, because they are more sensitive to grazing and other land uses than the surrounding land. Because of the linear nature of these areas, it would be very expensive to fence each one. The Forest Plan would attempt to solve grazing related riparian problems first through improved range management practices, and where that fails, through exclusion of livestock. We recognize that some riparian areas are too sensitive to tolerate any grazing. This management direction will apply to the examples you mentioned.

3. The National Forest System is mandated by Congress to develop and administer the renewable surface resources for multiple use and sustained yield of the several products and services obtained therefrom. We agree that nonconsumptive recreational use should have top consideration and priority on appropriate parts of the Coronado National Forest. The proposed Forest Plan provides this emphasis.

0602

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

OCT 9 - 1985

RECEIVED

5122 East [illegible] Street
Tucson, Arizona [illegible]
September 7, 1985

Coronado National Forest
300 West Congress
Tucson, Arizona 85701

Dear Sir:

The following are comments on the Coronado National Forest Plan.

1 ① Overgrazing should be ended immediately or at least within the first two decades. Improvement of range and watershed conditions should be the primary goal. Perennial stream riparian areas should be protected from cattle.

2 ② No new roads should be built to access fuelwood. Permit fees should be raised to cover costs.

3 ③ Bunk Robinson and Whitmore Canyon should be in the wilderness system, also the Mount Graham WSA in its entirety.

4 ④ No astrophysical complex should be built on Mount Graham

5 ⑤ Three Research Natural Areas should be designated:
Pine and Ramanote Canyons 4,000 acres
Ramsey Canyon 1700 acres
Mount Graham { High Peak Ciénega
Emerald Spring
Bear Wallow Spring

High Peak on Mt. Graham; several thousand acres should be made a "Zoological-Botanical Area" to preserve its unique animals and plants.

6 ⑥ The more restrictive rules for off-road vehicles, established for the Santa Catalina district, should be applied to all the Coronado: all motorized travel should be restricted to established roads. None allowed on foot Trails.

7 ⑦ There should be no development in sensitive riparian areas, such as Madera Canyon and Cave Creek.

8 ⑧ An E.I.S. should be prepared before any work is begun on the Mt. Lemmon road. Shuttle buses should be very seriously considered.

Sincerely
(Walter Pelech) Walter Pelech

Agency response to Walter Pelech

1. All alternatives will bring about a balance between grazing capacity and permitted livestock use within two decades of implementation.

   As you suggest, improvement of range and watershed conditions are two primary goals for eliminating overgrazing.

   We certainly agree that riparian areas need special management considerations, because they are more sensitive to grazing and other land uses than the surrounding land. Because of the linear nature of these areas, it would be very expensive to fence each one. The Forest Plan would attempt to solve grazing related riparian problems first through improved range management practices, and where that fails, through exclusion of livestock. We recognize that some riparian areas are too sensitive to tolerate any grazing.

2. Fuelwood harvest on the Coronado National Forest is an activity used to meet other resource objectives such as providing recreational opportunities and providing wildlife habitat. Some access roads are necessary to manage the stands to meet these resource objectives. Only ten miles of roads are planned during the Plan period.

   Permit fees are continuously evaluated and adjusted as needed to reflect current costs and product values.

3. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

   Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

   The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

   The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

   Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. The 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado

Agency response to Walter Pelech (continued)

National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

4. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

5. Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually precludes or severely restricts most resource uses, including recreational activities.

   We have carefully reviewed all proposed Research Natural Areas (RNAs) and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out such special areas. We recognize that the entire National Forest is a unique place and worthy of special care.

   It is important to bear in mind that the RNA program is National in scope and not limited to National Forest lands. It is not necessary or even desirable to have every vegetative type within the Coronado N.F. represented by RNAs on this Forest. Better representatives may well exist elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

   The desirability of establishing an RNA or Zoological/Botanical area (ZBA) (wet meadows and/or spruce-fir) near the summit of Mt. Graham, within the proposed astrophysical development area will be addressed in the EIS now being prepared to evaluate the observatory proposal.

Agency response to
Walter Pelech
(continued)

The plant community types of Pine/Canyon area are well represented in other existing and proposed RNAs including Pole Bridge, Santa Catalina, Goodding and Canelo on the Coronado N.F. The Pine/Ramanote area is quite remote and access would be too difficult to accomplish research objectives. We are, however, willing to study, with other interested parties, the desirability of designating a ZBA in that area.

Although the Nature Conservancy has an excellent facility in the lower portion of Ramsey Canyon, we do not believe the National Forest lands above that merit special area designation, especially since that area is well protected by wilderness designation.

6. The purpose of the planned policy is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

   The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

   Travel on trails in the Santa Catalina Mountains would continue to be limited to nonmotorized means. Specific restrictions could be applied to other Forest trails on a case by case basis when needed. The need for Forest-wide restrictions will be studied during the next planning period.

7. The Prescription for Management Area 7 outlines a management strategy for riparian areas, with strong limitations on any development in these important and sensitive areas. Madera Canyon and Cave Creek are singled out for special management consideration due to their sensitive nature, coupled with the high recreation use. Approximately half the summer homes in Madera Canyon were removed this year, with the other half scheduled for removal in 1990.

8. The proposed reconstruction of the General Hitchcock (Mt. Lemmon) Highway is for safety and maintenance needs. The road will be maintained as a scenic highway. It will be reconstructed within the existing alignment and to the existing standard of two lanes with a 30 mph design speed. A separate environmental analysis addressing site specific concerns for the road has been conducted. The analysis indicated use on Mt. Lemmon will not increase significantly due to the planned improvements. Use will increase as the result of population growth in Pima County and the surrounding area. The road is not the means by which to regulate or manage the users of the mountain. The highway is the means to transport all of the people safely to their destinations on the mountain.

   The Forest Service has considered other transportation alternatives for the mountain, and will continue to evaluate these. Neither the Coronado National Forest nor Pima County has the funding necessary to subsidize public transportation on Mt. Lemmon. Any alternative would have to be self supporting. Mt. Lemmon is very different from Sabino Canyon because there are private dwellings on Mt. Lemmon and because the road is a public highway. We do not have the options of closing this road or charging for use as we did in Sabino Canyon. No matter what transportation alternatives become available, the Mt. Lemmon Highway will be needed.

October 10, 1985

0642

Dear Sirs:

After reading through the "Summary of the Draft Environmental Impact Statement for the Coronado National Forest Proposed Plan" and skimming the Draft E.I.S. and complete Proposed Forest Plan, I recommend adoption of Alternative D. As an engineer and biologist, I view this plan as the best for giving a sustainable resource for what will become an increasingly scarce commodity: virgin wilderness community.

Development and population pressures will, over the next 50 years, substantially reduce the wilderness opportunities of public lands which are not protected by the Forest Service or which are in the private sector. As we are seeing increasingly, there are external factors beyond reasonable control which will automatically degrade the quality of these lands without any development internal to National Forest. Examples include air, noise, and light pollution, acid rain, and degradation of "integral vistas" from development of the land surrounding the forest.

Given the fragile nature of the biological communities owing to limited sources of water and relatively high temperatures and high levels of insolation,
1 the level of grazing and off-road-vehicle activity needs to be reduced even from present levels. Environment impact studies of grazing show it takes an inordinate amount of time to recover from its effects and to restore the natural plant and animal populations, besides the obvious thrill
2 of finding cows in a high mountain meadow instead of deer. Off-road-vehicles leave scars which heal over a period of years, not weeks or months.

As predicted by Naisbitt's book, Megatrends, we are moving away from a manufacturing-based economy toward an information-based economy. The necessity to extract raw materials domestically to maintain a healthy economy will diminish. One of the biggest economic success story of our time is Japan. They have accomplished their miracle without benefit of many local raw materials. This is all by way of questioning the conventional wisdom of exploiting the riches of the earth irregardless of where they happen to be, in the middle of Nevada or the heart of the Chiricahua's. Alternative D seems to go the furthest in weighing the long-range perceived value of unspoiled habitats against the odds of near-term returns on natural resource extraction. It is likely that the conventional wisdom will swing toward an ever-increasing value being applied to our unspoiled recreational resources for just that, recreation.

The new head of the Forest Service, William Mott, has added weight to the substantial yet intangible economic benefits from areas where urbanites can find solitude and beauty. Who's to say what contribution to GNP is realized when overworked Yuppies get away from the cities and recreate in woods.

The additional Research Natural Areas and Zoological and Botanical Areas would provide more opportunities to monitor and improve the health of living systems both within and outside the Forest Service lands. They could act
3 much like the canaries that miners used to take down the shafts as harbingers of impending danger. Humankind, which is so dependent on functional biological systems for its survival, will have a better chance [illegible] a sustainable lifestyle with the knowledge to be gained by su[illegible]

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 11 1985
RECEIVED

I appreciate this opportunity to give my input into the planning process for southeastern Arizona's National Forests. It is evidence that the democracy which has provided such a good quality of life for many is still alive and well. I look forward to hearing how you decide on these issues.

Sincerely yours,

Neil Petersen

Neil Petersen

Agency response to Neil Petersen

1. We agree that it will be necessary to temporarily reduce grazing, while measures to improve the land's capacity are undertaken. This is the reason that the Forest Plan predicts a reduction from the present 400,000 AUMs to 350,000 in the first period and 338,000 in the second period. As the range responds to improved range management, coupled with decreased numbers, use will be allowed to follow the rising capacity. It is anticipated that long term productivity will be at about 360,000 AUMs, about ten percent less than present.

2. The planned ORV policy in the Forest Plan is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

   The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

   The Forest Plan makes no recommendation for closing any specific roads. It does suggest that roads not needed for resource use, including vehicular recreational activities, should be closed to provide additional nonmotorized recreation opportunities. The intent of this is to maintain as wide a spectrum of recreational opportunities as possible. Before any specific roads or trails are closed, a site specific environmental analysis will be conducted. This analysis includes contacting potentially affected users to determine existing and future use requirements.

3. We appreciate your support for the proposed Research Natural Areas and Zoological/Botanical Areas.

Rec'd 10-11-85

COMMENTS

Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

0659

All comments must be received by the Coronado National Forest no later than October 11, 1985.

Please print or otherwise write legibly - Thank you.

Comments: I am concerned about several aspects of the Coronado Land Use Plan:

1 1) I would like the Forest Service to continue the present plan to reduce the amount of grazing to a more acceptable level.

2 2) I feel that lumbering should be restricted to environmentally sound control of forests.

3 3. I would like to see more areas designated as recreational use only and off-limits to any other forms of development.

4 4. Allowing special interest groups or companies sole use of our public lands is wrong. Grazing and some lumbering would not stop other recreational uses of the land. Mining and astrophysical complexes definitely would restrict access. Our forests should remain accessible to all of us.

5 Additional comments on Mt. Graham on attached page.

Name: Cynthia Pierce

Date: 10-10-85

Address: 3003 W. Camino Christy Tucson 85741

October 10, 1985

Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

Dear Mr. Tippeconnic:

I am strongly opposed to any development on Mt. Graham by the Steward Observatory. The negative consequences will be far reaching and unacceptable when you consider the following points:

5

1. There will be a vast loss of habitat for many of Mt. Graham's endemic species. The effects on the threatened red squirrel could be nothing less than disastrous. Since the Forest Service is our nation's guardian for wildlife, approval of this proposed astrophysical complex would indeed be a serious mistake.

2. Mt. Graham is already a very valuable recreational area for the growing population in Southern Arizona. We will need more, not fewer areas for this recreation in the future. Limiting 5 square miles of the top of our most beautiful mountain for the private use of a few astronomers does not adequately meet the needs of the vast majority of the public.

3. Steward Observatory's projections for light pollution interference change every time they are asked the question. Light glow and light creep will indeed make Mt. Graham telescopes unusable in the near future. We, as taxpayers, should not be asked to pay for such an expensive, short-term project which would also endanger our wildlife and take away our recreational areas.

4. Close study of the Steward Observatory data shows bias and inadequacies. Their studies were apparently done simply to justify the decision already made. As an example, their cloud cover data was taken each morning at 6:20 a.m. Most scientists do not study the universe at that hour and anyone who has lived in our area knows that we often have evening storms which clear out sometime during the night and leave us with clear skies at dawn. Other possible sites had NO data at all!

5. The residents of the Gila Valley have been misled by unfounded promises of economic gains. The Steward Observatory does not understand the realities of construction and other economic concerns yet they are quick to assure those people in Safford that the Gila Valley will see large benefits. In reality, their term "local" includes the Tucson area where the vast majority of economic gain would be seen. Can the opinions of these residents be valid when many are based on such false promises?

5 6. It is my understanding that the Environmental Impact Statement will be addressing only Phase I of the astrophysical proposal. This, to me, is unacceptable when you consider that the Steward Observatory stated in a public meeting that they would not do Phase I without the other two simply for financial reasons. If they are unwilling to settle for only Phase I, then I feel that the Forest Service should equally refuse to accept an EIS which addresses only Phase I. The Steward Observatory is asking the Forest Service and the public to write a blank check for their entire proposal when we will be shown the ramifications for only a small portion of the development. Additionally, the office doing the EIS is being asked to make judgements and predictions from data collected over a relatively short period of time. Can their conclusions be accepted without questions?

7. Mt. Graham is of value to other scientists and could provide us with equally valuable information by leaving it free of development so that natural scientists can study the unique wildlife and vegetation. Archaeologists should surely be given the opportunity to study the unexcavated Mimbres site on Hawk's Peak. These studies would be impossible under the Steward Observatory's proposal.

6 8. A very dangerous precedent will be set if the Forest Service approves the use of our forest for the exclusive use of one special interest group. Can you legally deny the next private group if they have a valid EIS?

Please consider these points in your evaluation of this issue. It is my hope that Mt. Graham will be kept as an unspoiled symbol of our pride and concern for the preservation of our public lands.

Sincerely,

Cynthia Pierce

Cynthia Pierce
3003 W. Camino Christy
Tucson, Arizona 85741

Agency response to Cynthia Pierce

1. The Forest Plan would balance livestock grazing use with capacity by the second decade by reducing numbers and increasing capacity. The sustained level of use by the fifth decade is estimated to be 360,000 AUMs.

2. Any wood harvest planned for the Coronado will be done in an environmentally sound manner. The primary objective of wood harvest is to benefit wildlife and for recreational values.

3. The vast majority of the Coronado National Forest lands provide for some form of public recreation use. The types and extent of use vary due to many factors such as resource capability, safety, and transportation systems.

4. The various laws governing management of the National Forests provide for considering a variety of uses and activities. Any legitimate proposal must be considered along with other resource needs and uses. The need for public use and access to the National Forest lands is always given consideration.

5. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

6. A precedent is not being set by the proposal for an astrophysical area on the Pinaleno Mountains (Mt. Graham). The Multiple-Use Sustained Yield Act of 1960 is only one of many laws or acts which govern management of the National Forests. For example, the Acts of June 4, 1897 (Organic Act) and March 4, 1915 provide the basic authorities for permitting special uses, such as astrophysical sites. Any legitimate proposals for use of the public lands must be evaluated through an environmental analysis which may result in preparation of an environmental impact statement. Public involvement is an important part of this decision making process which ultimately determines the most appropriate use of the public land.

Rec'd 10-11-85

COMMENTS

0660

Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

All comments must be received by the Coronado National Forest no later than Oct. 11, 1985.

Please print or otherwise write legibly - Thank you.

1 Comments: ① Cattle grazing on the C.N.F. should be reduced to the capacity
of support without overgrazing in 10 years or less. ② Fire suppression is not
2 necessarily the best management of the forest. Please keep an open mind regarding
controlled burns to keep the C.N.F. healthy. ③ Vehicles should not be allowed
3 off roads and trails, however designated roads and trails should be approached
(as a management tool) with extreme caution because of the potential for
unfair access restrictions ④ I am opposed to any new road construction in
4 the C.N.F. for any reasons other than a very specific need for recreational
access. Road building for such things as fuelwood gathering, mining, livestock
support and lumbering adversely impacts the visual beauty of the C.N.F.
⑤ Lastly and definitely most important is the astrophysical proposal in the
5 C.N.F. Plan. This proposal does not belong in the C.N.F. plan under any
circumstances, and is widely opposed throughout the state by every
major environmental and sporting group and any private user of the C.N.F.
who analyzes the incredible arrogance and damage this proposal would
bestow upon five linear miles of the top of the "Crown Jewel" of
the C.N.F. This proposal is not managing for the best "Net Public Benefit".

Name: Paul C. Pierce

Date: Please see attached page.

Address:

1701 E. Factory Ave. Suite H.
Tucson, Ariz. 85719

October 10, 1985

COMMENTS CONTINUED

In the D.E.I.S. you say that Alternatives A &B would preclude development of the astrophysical use of Mt. Graham and result in a loss of research opportunities (page 113). The astrophysical research that would occur on Mt. Graham if you approve this proposal could without a doubt take place at already developed astrophysical sites throughout Western North America (Mauna Kea in Hawaii and Sacramento Peak in New Mexico are examples). What of the natural studies of a mountain top with the biological importance of Mt. Graham that will never take place once this development eliminates huge patches of relict Pleistocene spruce-fir forest, and the rare, unique and endemic plants and animals that the forest contains?

6 Because of its unique geographical location and isolation from other mountain ranges, the Pinalenos contain a staggering wealth of information about our natural history and present flora and fauna. We have only begun to study this storehouse of knowledge and this proposal threatens to cut mankind off from answering basic questions just as important as the questions the astronomers could answer on other mountain tops.

The D.E.I.S. also says on page 113 that precluding the development of the astrophysical site fails to compliment the other astrophysical sites in southern Arizona. When did managing the public trust for the maximum long term net public benefits in an environmentally sound manner, which includes such numerous management goals as 1.Recreational Uses 2.Visual Quality 3.Cultural Resources 4.Wilderness 5.Wildlife and Fish 6.Timber and Fuelwood 7. Soil and Water, become subservient to "complementing the astrophysical sites in southern Arizona," which falls under one management objective which is 8.Special Uses?

I have the utmost confidence that under the light of public comment and scrutiny, the Forest Service will be allowed to manage the Coronado National Forest to serve all of the people and numerous resource considerations and not for any one special interest use because of political and economic pressures brought against the Forest Service by that special interest.

Thank you for your careful consideration.

Sincerely,

Paul C. Pierce

Paul C. Pierce
1701 E. Factory Suite H
Tucson, Arizona 85719

Agency response to
Paul C. Pierce

1. The Forest Plan gives direction to balance livestock grazing use with capacity. It predicts this will happen during the second decade. Since first priority will be given to those allotments in unsatisfactory condition, we see no justification for the additional cost and impacts of achieving this balance sooner by simply reducing livestock numbers.

2. The Forest Plan will allow us the option of suppressing fires to protect life, property, and resources or managing fires to meet resource objectives.

3. The proposed policy for managing motorized vehicles would continue to allow their use on existing roads and trails. Travel off roads and trails would not be allowed except by permit. The designation of roads or trails is seen as a management tool to meet several objectives such as informing the public where they are.

4. New roads are constructed for the purpose of supporting any legitimate use of the National Forest. The intent of the Forest Plan is to keep the road design at the minimum necessary to meet the needs of the activity and to accommodate other resource uses to the maximum extent possible.

5. Any proposal, including the Mt. Graham Astrophysical Area, must be subjected to an environmental analysis. The Coronado Forest Plan is the result of such an analysis conducted for the entire Forest. It was appropriate to attempt to analyze the astrophysical proposal as part of the Forest Plan analysis. However, due to the timing, complexity, and controversy, we now have to deal with the astrophysical proposal in a separate analysis. The results of this separate analysis will ultimately be included in the Forest Plan.

6. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

0631

C
T [illegible]
L 4016 N Park 85719

Oct 10, 1985

CORONADO N. F.
OCT 10 '85

Forrest Supervisor
Coronado National Forrest

Please accept my comments on the Proposed Plan for the forrest for the next 50 years as follows:

1 1. I favor the option D approach as set forth in the Draft EIS over the other options. This choice claims to emphasize the natural environment and opportunities for dispersed recreation, wildlife and wilderness recreation.

2 2. The options for wilderness should be maximized both on Forrest and BLM lands.

3 3. Your EIS should consider the effects of cattle grazing on such life forms as the desert tortoise in fact, nowhere is the desert tortoise mentioned.

4 4. Privately held property at places like Cochise Stronghold (East) and the Pajarito Mountains at East end of Ruby Road in the nat'l Forrest should be bought out in a timely manner and added to the system.

5 5. Conservation Groups such as the Audubon, Sierra Club & Wildlife Federation should be consulted on forrest planning and not an anonymous "Citizens Group" as was credited with Option D.

6 6. The astrophysical use espoused by the Forrest Service for Mount Graham should be disallowed.

Sheet 1 of 2

7 7. Public access to all parts of the Forrest should be maintained (over cattle guards where applicable) to such places as the west end of the Atascosa Mountains.

8 8. The very rapid population growth in Arizona and the Southwest dictates that the National Forrest must be enlarged (not given away to the BLM) so that future generations can continue to enjoy our National heritage as set forth in the National Forrest System as created by Theodore Roosevelt.

1 9. The Proposed Plan reflects Ronald Regan's current school of economic thought and not long term needs to preserve a viable forrest system.

D L Pierson
4016 N Park Ave
Tucson, Az 85719

P.S.

6 Please send the Mt Graham EIS when it becomes available.

Sheet 2 of 2

Agency response to D. L. Pierson

1. All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C, project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives, as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

2. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

   Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

   The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

   The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

   Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres.

Agency response to
D. L. Pierson
(continued)

This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

3. Desert tortoise habitat is quite limited on the Coronado, and we know of no area of the Forest where this animal is being impacted by livestock grazing.

4. Forest Planning has identified those private lands that would be desirable for addition to the National Forest. Funds to acquire these lands either by exchange or direct purchase are very limited.

5. The citizens group that developed Alternative D primarily consisted of members from the groups you mentioned. The group approached us with the alternative proposal. We welcome and solicit involvement from all segments of the public.

6. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

7. The Forest Plan identifies public access needs to all parts of the National Forest. These access needs are prioritized because of limited funds for this activity. See page 29 of the Draft Forest Plan.

8. The question of public land exchanges between the Bureau of Land Management and Forest Service is outside the scope of the Forest Plan. That question is now being studied by the Congress which will make the final decision.

CORONADO N. F.

OCT 10 '85

0623

413 Halsey Valley Rd
Spencer, NY 14883
October 6, 1985

Dear Mr. Tippeconnic,

I'm writing to comment on the "Summary of the Draft Environmental Impact Statement for the Coronado National Forest Proposed Plan." I believe that the Proposed Action represents a fair and economical compromise between competing interests, is an improvement over the current management plan (A), and is preferable to plans B, C, and E. As a wilderness hiker and bird watcher who stays in the Cave Creek area, I like plan D, but I can see how other interest groups might find some of its proposals too restrictive. I believe that the Proposed Action adequately addresses the most serious environmental issues, and I urge that it not be weakened in this respect. Comments on specific items follow.

1 I agree with the restrictions the Proposed Action places on off-road vehicles. Because of the noise and damage they cause, I'd like to see such vehicles limited to the roads while in the National Forest.

2 I agree that livestock numbers must be brought into balance with range capacity, and that initially this should involve decreasing the number of animals. Some areas of the National Forest really stand out as overgrazed, even if it only represents 16% of the total land. I hope that the

2 increased livestock numbers projected for periods 4 and 5 will only occur when range quality actually shows the expected improvement.

3 I have no objections to astrophysical use of Mt. Graham, but I like Alternative D's approach the best. I'm not convinced of the need for an aerial tram.

4 I favor creation of a Zoological-Botanical Area for the South Fork of Cave Creek. I don't think the road needs to be closed, but speed bumps would be necessary to slow traffic, as the worst offenders habitually ignore speed limits. I agree with conversion of the campground to day use and vehicle control to prevent further damage there. I believe the South Fork trail should be closed to off-road vehicles, and this rule (as well as the above changes) should be strictly enforced. The proposed foot path, pull-outs, and benches

5 seem like good ideas. As for grazing, I don't know what "30% use of key species in key areas for a short time in the fall" really amounts to.

6 Since only 762 acres have been proposed for the ZBA, I have to wonder why grazing will be permitted there at all. If permitted, it should be strictly controlled and its effects closely monitored.

7 In summary, I think the Proposed Action is a good plan and hope that its environmental considerations will not be weakened in the final document. Of the other alternatives, only D seems to offer some suggestions I consider valuable.

Sincerely,
Richard F. Plage.

Agency response to Richard F. Plage

1. The purpose of the planned policy is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

   The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

2. We agree with you that it will be necessary to temporarily reduce grazing while measures to improve the land's capacity are undertaken. This is the reason that the Forest Plan predicts a reduction from the present 400,000 AUM's to 350,000 in the First Period and 338,000 in the Second Period. As the range responds to improved range management, coupled with decreased numbers, use will be allowed to follow the rising capacity. It is anticipated that long term productivity will be at about 360,000 AUM's, about 10 percent less than present. Any future increases in livestock numbers will be based on increased capacity as you suggest.

3. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

4. The Forest Plan will provide the management you suggest for South Fork of Cave Creek with the exception of the foot path, pullouts, and benches. These were an error in the draft EIS and have been eliminated from the final EIS. The intent is to utilize the existing road as a foot trail as well as a roadway for vehicles.

5. Livestock tend to concentrate and feed in certain areas called "key" areas. These are generally flat areas and often near water. Livestock also prefer certain species of grass over others. These are known as "key" species. The thirty percent use is the maximum amount of use the key grass species can tolerate before the plants themselves are damaged physiologically. The term "fall" means grazing would occur primarily in the fall season of each year. Therefore, the guideline of "thirty percent use of key species in key areas for a short time in the fall" is used to establish and monitor the level of livestock grazing use based on the most heavily used areas.

6. The 762 acre Zoological/Botanical Area is part of an established livestock grazing allotment. Elimination of this portion of the allotment from grazing would require expensive and, we believe, unnecessary management practices such as fencing.

   Moderate, well-managed grazing has proven to be compatible with the riparian and other sensitive values in the Cave Creek Area. Both forks of the Canyon have been grazed for many years, and the areas are well-known as a showcase of riparian vegetation and unique birdlife. We agree that the unique resources of the area must take priority over production of livestock forage, but feel that it has been demonstrated that the two uses are not mutually exclusive.

7. Thank you for your support of the Proposed Action. All changes to the final documents are intended to strengthen the Forest Plan and environmental considerations.

COMMENTS

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
AUG 19 1985
RECEIVED

0086

Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

All comments must be received by the Coronado National Forest no later than ______________.

Please print or otherwise write legibly - Thank you.

Comments: I ATTENDED THE OPEN HOUSE MEETING IN ORACLE AZ ON AUGUST 13. I WISH TO THANK STEVE PLEVEL AND ALL THE OTHERS WHO GAVE THEIR TIME TO ANSWER MY QUESTIONS.

AFTER STUDYING THE ALTERNATIVES IN THE DEIS AND THE MAPS AND CHARTS AT THE OPEN HOUSE, I FEEL THAT ALTERNATIVE 1D IS THE BEST MANAGEMENT PLAN FOR THE CORONADO. ECONOMICALLY, IT IS THE SECOND LOWEST COST ALTERNATIVE (PA IS FIRST) WHILE PROVIDING A HEALTHY RETURN TO FEDERAL, STATE, AND LOCAL GOVERNMENT TREASURIES. AND IT PROVIDES THE MOST PROTECTION FOR OUR ALL IMPORTANT WILDLANDS. I CONTINUE TO HAVE RESERVATIONS ABOUT THE TELESCOPE ON MT. GRAHAM.

Name: JAMES E. POSEDLY

Date: 8/14/85

Address: PO BOX 411
ORACLE, AZ 85623

Agency response to
James E. Posedly

All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C, project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

0634

CORONADO N.F.
OCT 11 '85

JEFF PRICE
7351 E SPEEDWAY # 33B
TUCSON, AZ 85710
OCT 10, 1985

SIRS,

1 This letter is in support of Alternative D for the Coronado National Forest. Although I feel that the proposed alternative has many merits I believe that the Coronado National Forest needs more areas protected by either wilderness, zoological-botanical areas, and/or research natural areas than currently available or proposed in the alternative. It is imperative that we stop thinking about how much we can use and abuse now and start thinking about future use. I believe alternative D best fulfills these needs.

2 An additional complaint I have against the proposed aerial tramway to the Mt Graham astrophysical site. This would DESTROY one of the most beautiful areas in Arizona as well as many acres of unique habitat. I supported the astrophysical site when first proposed to be 1 or 2 telescopes. Well, give them an inch... Now they want a tram and 18 telescopes. I strongly feel that if this is allowed a time will come in the very near future when they will want the entire mountain closed off. Only you can protect the recreational and habitat aspects of Mt. Graham.

Please, consider alternative D.

Thank you,
Jeff Price

Agency response to
Jeff Price

1. All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICO's). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C, project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives, as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICO's. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICO's given future budget projections.

2. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

COMMENTS

0021

FOREST SERVICE
Coronado Nat'l Forest
TUCSON, ARIZONA
A[illegible] 1985
RECEIVED

Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

All comments must be received by the Coronado National Forest no later than [redacted] Oct. 11 – 1985

Please print or otherwise write legibly - Thank you.

Comments: I have looked over and studied the Summary of draft statement for the Coronado National Forest proposed Plan, and I agree with it in behalf of The Gila Valley and Mt Graham.

I think it to be a very workible plan for development of beter recreational Vaciltes in General. also in behalf of Employment for this part of Arizona And am there for for it 100% to be Carried out for what it was intended to do

sincerly yours

Name: Wm J Priest

Date: 8/2/85.

Address: PO - BOX 994 Safford
85548

Agency response to
Wm. J. Priest

We appreciate your support of the proposed Forest Plan.

Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

October 12, 1985

0673

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 16 1985
RECEIVED

Marc Keplan
U.S. Forest Service, Coronado National Forest
300 W. Congress
Tucson, Ariz. 85704,

Dear Sir:

Thank you for sending me the information about Proposed Alternatives for Future Management of the Coronado National Forest, especially the Summary, since I found the Draft Statements themselves simply too voluminous and complicated for me to reasonably interpret.

As this letter is being written past the October 11 deadline and since you indicated that I might request a reasonable extension since I recieved the information so close to the deadline, then please let this letter constitute my request for an extension.

I appreciate the vast amount of time, money and energy that has been expended to prepare and draft these proposals. To bring into any balance the remarkable number of uses and interests for the Coronado cannot be an easy task.

My main concern is that the Coronado not be significantly changed or destroyed by the current onslaught of urban growth or that it be adversely impacted by overuse by one particular interest such as grazing or fuelwood cutting. I am interested in maintaining as much visual quality and wilderness as possible, as well as protecting endangered species.

My vote, therefore, goes to Proposal D which offers more toward my interests than the others. There are always trade-offs, to be sure, and I would change certain things even in this proposal, but I accept that trade-offs are necessary.

I would express an opposition to any development of observatories on Mt. Graham and to the widening of the Mt. Lemmon Road if that would affect the visual quality of the road as it now exists.

I thank you for your patience and time. I would like to be informed of other proposals and of the outcome of the proposals to be decided upon soon.

Sincerely
William E. Pritchard
William E. Pritchard
12 Camino Coronado
Tucson, Arizona 85704
(602) 247-6295

Agency response to William E. Pritchard

Thank you for your continued interest in management of the Coronado National Forest. We share your concerns about balanced and properly managed uses of the Forest. We believe the Forest Plan addresses these concerns. Your name will be maintained on our mailing list for Forest planning.

All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C, project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

OCT 2 1985

RECEIVED

0720

October 18, 1985

Coronado National Forest
300 W. Congress
Tucson, AZ 85701

Forest Supervisor:

As a frequent recreational user of the Coronado National Forest, I wish to make several recommendations for the Coronado National Forest Plan.

1 1) Improve the existing trail system by clearing and more adequately signing trails. The Green Mountain, Guthrie Mountain, Brush Corral and Pusch Peak trails are a few in need of improvement with which I have recent experience.

2 2) Recommend the Mt. Graham, Bunker Robinson and Whitmore Canyon Wilderness Study Areas for inclusion in the National Wilderness Preservation System. The Bunker Robinson area should also include adjacent Baker and Guadalupe canyons. Save Mt. Graham from becoming another Kitt Peak by recommending as many wilderness acres as possible. Keep the remote Peloncillo Mountains wild for future generations. I hiked through the Peloncillos not long ago and was impressed by the diversity of flora and fauna there.

3 3) Reduce cattle grazing on forest lands and better regulate existing grazing. Too often I've been on some remote trail, high on a mountainside, hoping to spot some rare wild creature, only to be confronted by cattle and cowpies. I have experienced this in almost all districts of the Coronado. What are cattle doing high up on wooded mountain slopes? In my opinion they do not belong there.

4 4) Build no more roads on the Coronado National Forest. Roadbuilding is
economically and environmentally wasteful. It destroys prime wildlife habitat,
damages streams and trails, causes severe erosion and downgrades the integrity
of the forest in general. No new roads for lumber interests or fuelwood access.
5 Also, all motor vehicle traffic throughout the Coronado districts should be
restricted to already existing roads.

6 5) Protect fragile ecosystems by designating appropriate portions as Research Natural Areas. In particular, this should include Pine Canyon, Ramsey Canyon and Ramanote Canyon. Also the High Peak Cienega and Emerald and Bear Wallow springs on Mt. Graham. Protect as a Zoological-Botanical Area the several thousand acres of pleistocene spruce-fir forest surrounding High Peak on Mt. Graham.

7 6) Protect wet and dry riparian habitats throughout the Coronado with suitable RNA/ZBA designation.

8 7) Monitor the health of the various forest ecosystems more closely by using indicator species that better exemplify individual ecosystems.

Thank you.

Sincerely,

Frank W. Puncer

Frank W. Puncer
7626 E. Jalapa Pl., Tucson, AZ 85710

Agency response to Frank W. Puncer

1. The Forest Plan calls for maintaining and signing all trails on the Forest to a level appropriate for the type and extent of use they receive. Maintenance of the trails you mention will be done within available funding and overall Forest priorities.

2. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

   Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

   The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

   The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

   Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

   The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

Agency response to
Frank W. Puncer
(continued)

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

3. We agree with you that it will be necessary to temporarily reduce grazing while measures to improve the land's capacity are undertaken. This is the reason that the Forest Plan predicts a reduction from the present 400,000 AUMs to 350,000 in the First Period and 338,000 in the Second Period. As the range responds to improved range management, coupled with decreased numbers, use will be allowed to follow the rising capacity. It is anticipated that long term productivity will be at about 360,000 AUMs, about 10 percent less than present.

   Some wooded mountain slopes have been determined to be suitable for livestock grazing and others have been determined to be unsuitable. It is difficult to give you a more precise answer without knowing a particular location.

4. In general the existing transportation system for the Coronado National Forest is adequate to meet anticipated resource use and management needs. New road construction will be based on needs to meet specific resource management objectives. The Forest Plan predicts this need will be limited to low standard roads for wood harvest and mining activities. Approximately ten miles will be needed for wood harvest. We are unable to predict the need for mining but expect it to be minimal.

   Road management emphasis will be on maintenance and reconstruction of existing roads.

5. The purpose of the planned policy is to continue motor vehicle use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

   The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

6. We agree that identification and designation of appropriate RNAs is important and believe the Coronado N.F. can be justifiably proud of leading the Southwestern Region in that effort. We have more RNAs than any other Forest and with our proposed additions, will have represented all targeted types on this Forest.

   Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually precludes or severely restricts most resource uses, including recreational activities.

   We have carefully reviewed all proposed Research Natural Areas and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out each special area. We recognize that the entire National Forest is a unique place and worthy of special care.

Agency response to
Frank W. Puncer
(continued)

It is important to bear in mind that the RNA program is national in scope and not limited to National Forest lands. It is not necessary or even desirable to have every vegetative type within the Coronado N.F. represented by RNA's on this Forest. Better representatives may well exist elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

The desirability of establishing an RNA for wet meadows or ZBA for the spruce-fir type near the summit of Mt. Graham, within the proposed astrophysical development area will be addressed in the EIS now being prepared to evaluate the observatory proposal.

The plant community types of Pine/Ramanote area are well represented in other existing and proposed RNAs including Pole Bridge, Santa Catalina, Goodding and Canelo on the Coronado N.F. The Pine/Ramanote area is quite remote and access would be too difficult to accomplish research objectives. We are, however, willing to study, with other interested parties, the desirability of designating an RNA or ZBA in that area.

Although the Nature Conservancy has an excellent facility in the lower portion of Ramsey Canyon, we do not believe the National Forest lands above that merit special area designation, especially since that area is well protected by wilderness designation.

7. The research natural area (RNA) and zoological/botanical area (ZBA) designations are used where a special management emphasis is needed. The management of RNAs precludes most uses, including recreational use. Therefore, it is neither necessary nor desirable to give these designations "to all wet and dry riparian habitats." Adequate emphasis and protection is provided by the management prescriptions for Management Area 7 of the Forest Plan.

8. Early in the planning process all interested wildlife managers were invited to participate in the selection of indicator species. Participants in this process included representatives of Arizona Game and Fish, U.S. Fish and Wildlife Service, the University of Arizona, Tucson Audubon Society, The Nature Conservancy, and Forest Service Wildlife Biologists. They agreed on a list that seemed appropriate at the time. The list of management indicator species will be evaluated and updated as part of the ongoing monitoring process.

0022

1312 Apache
Richardson Texas 75080

July 20, 1985

Coronado Nat Forest
300 W Congress St
Tucson, Az, 85701

Dear Sirs,

Upon reading the Summary of the Draft Environmental Impact Statement, I support Alternative D for a management plan for the Coronado National Forest.

CORONADO N. F.
JUL 24 '85

Action X Info ✓		Init	Action X Info ✓		Init	Action X Info ✓		Init
	FS			RES			LA	
✓	LMP	[illegible]		BAF			ARCH	
	AO			PER			WL	
	ENGR			AS			WS	
	RBE			CS			SLS	
	SLT			LE			DISP	
	PRIC			RECP			PIO/IS	

Sincerely,

Donald L Purinton

Agency response to
D. L. Purinton

All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

0710

Rec'd 10-11-85 C. Vaccaro 3:30 p.m.

R&J ASSOCIATES
4100 N. Romero Rd. 108, Tucson, AZ 85705 (602) 293-3612
Robert C. Tweit, Ph.D
Joan C. Tweit, M.A.L.S.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 11 1985
RECEIVED

October 11, 1985

R.B. Tippeconnic, Forest Supervisor
Coronado National Forest
301 West Congress Street
Tucson AZ 85701

COMMENTS ON THE PROPOSED CORONADO NATIONAL FOREST PLAN

GRAZING

The Coronado National Forest staff is to be commended for reducing grazing on the forest over the last 10 years. To discontinue that effort now and continue to degrade the Forest resource by a high level of grazing for the next 50 years would be unfortunate. Continuation of unrestricted grazing in riparian areas and overgrazing the forest generally do not meet the objective to "protect unique natural values". Nor does the Proposed Alternative include designating Research Natural Areas chosen to provide baseline and comparative data on grazed and ungrazed land; both riparian and upland areas are needed.

The best way to avoid further damage to the resource is to continue to reduce permitted grazing. Vegetative manipulation to improve the range is an expensive process, not economically justified by the present AUM fee and Congress is unlikely to appropriate funds for range improvement in an era of $200 billion deficits. At the present fee level the Forest Service is subsidizing permittees to overgraze the Coronado at the expense of the taxpayer, and promoting unfair competition for the rancher not holding federal grazing permits. The Forest Service is mandated to protect the resource and to manage for multiple usage, not to allow one type of use to monopolize and destroy the resource.

1 The 98 jobs provided by grazing on Forest Service land could be increased by encouraging permittees to convert to guest ranch operations serving the more economically stable tourist industry. A rare bird which brings 3000 visitors to Cave Creek at an average cost of at least $1500 each, adds more money to the Arizona economy than an uneconomic grazing industry which now exists in Arizona primarily for tax-shelter benefits.

Overgrazing is a rapid and highly effective form of vegetative manipuation, a process which has changed the Arizona landscape dramatically over the last 100 years and increased erosion. We strongly urge the Coronado to greatly reduce if not eliminate grazing on the forest. The Coronado is a poor forest for grazing and should not have 1/4 of all the AUMs of forests in the Southwestern Region.

RECREATION

2 The Coronado is a recreation forest. Recreation is the most cost effective usage on the forest and should be given priority over grazing and fuelwood harvest. Funds spent on recreation offer far better value to the taxpayers and the state of Arizona than money spent on the subsidy of grazing or fuelwood harvest.

The restrictions in the Proposed Alternative on ORV usage on the Forest are excellent

BIRD POPULATION STUDIES LITERATURE SEARCHING AND INDEXING
NATURAL HISTORY INTERPRETATION

since unrestricted ORV usage can rapidly promote erosion and destroy vegetation.

Conversion of the South Fork (Cave Creek) campground to day use is also a wise step since camping use is increasing and threatening the proposed zoological-botanical area.

Recreation facilities in the Santa Catalinas are badly in need of maintenance and repair. This should be a first priority for budgeted funds before any money is spent on construction of new facilities. The Proposed Alternative includes no plans for repair of facilities in the Catalinas.

Trail maintenance and upgrading should also be a first budget priority. Many miles of mapped trail are virtually nonexistent; many more miles need repair and reconstruction to provide a safe hiking experience for the visitor and to prevent erosion and loss of vegetation.

2 Money has recently been spent on the winter sports area on Mt. Lemmon which represents only 2% of the recreaction useage on the Forest but no funding has been allocated for the rehabilitation of camping and picnic facilities. The facilities on Mt. Lemmon are a disgrace to the Forest - dirty, littered and rundown. In no other forest, or district on the Coronado, including areas adjacent to the metropolitan areas of Albuquerque, Las Vegas, Portland, and Seattle have we seen the facilities in such sad condition.

Neglect of these areas is a particular disservice to the Arizona tourist industry. Visitors may drive up Mt. Lemmon for the spectacular views but will not stay when they can not find a clean toilet to use. The longer people spend in the area, the more they will spend on meals and lodging.

WILDERNESS

3 Since recreation is the most cost efficient activity on the Coronado and since wilderness has the highest benefit value of any type of recreation, all of the areas proposed as wilderness in Alternative D should be included in the final plan. This would increase the present net value with almost no increase in cost. Demand for widerness recreation has increased faster than population in the past 20 years and will continue to grow at a rapid rate on the Coronado. Wilderness use has a low impact on the resource in contrast to dispersed recreation and other non-wilderness uses.

ROADS

4 Establishing a shuttle service on the Mt. Lemmon highway is much preferable to spending $12,000,000 or more to widen the road. Widening will not lower the accident rate and may increase the number of fatalities since higher speeds will be possible. A shuttle would also reduce the amount of litter on the highway and in the recreation areas as it has in Sabino Canyon as well as providing a quality experience for visitors.

RESEARCH NATURAL AND ZOOLOGICAL-BOTANICAL AREAS

5 We support the recommendations of Alternative D in addition to those in the Proposed Alternative. The Coronado is a forest with a wide variety of habitats, not presently represented in protected areas and these areas need to be set aside to allow collection of baseline biological data about the Forest badly needed for further planning.

Sincerely,

R. C. Tweit

Agency response to
R & J Associates

1. We agree with that it will be necessary to temporarily reduce grazing while measures to improve the land's capacity are undertaken. This is the reason that the Forest Plan predicts a reduction from the present 400,000 AUMs to 350,000 in the First Period and 338,000 in the Second Period. As the range responds to improved range management, coupled with decreased numbers, use will be allowed to follow the rising capacity. It is anticipated that long term productivity will be at about 360,000 AUMs, about 10 percent less than present. Any future increases in livestock numbers will be based on increased capacity.

We certainly agree that riparian areas need special management considerations, because they are more sensitive to grazing and other land uses than the surrounding land. Because of the linear nature of these areas, it would be very expensive to fence each one. The Forest Plan would attempt to solve grazing related riparian problems first through improved range management practices, and where that fails, through exclusion of livestock. We recognize that some riparian areas are too sensitive to tolerate any grazing.

The intent of the RNA program is to represent undisturbed (including ungrazed) natural plant communities. The existing and proposed RNAs on this Forest do represent both riparian and upland areas. The baseline data from those areas can be compared to data from grazed areas both within designated research areas (such as the Santa Rita Experimental Range) or general forest areas.

Under the proposed Forest Plan, less than 4 percent of the suitable rangeland would have any vegetative manipulation. Most range improvements will involve fences and waters. The Plan does not depend on normal appropriations from Congress to complete the improvements. They will be partly funded from Range Betterment funds that are returned to each National Forest from grazing fees paid by permittees. In addition, the permittees themselves will make direct contributions in the form of labor and materials.

You are correct that the Forest Service is mandated to protect the resources and manage for multiple uses. This is exactly what the Forest Plan is designed to do.

As a matter or principle, we do not believe that it is appropriate to single out Forest Service range permittees as being the sole recipients of a federal "subsidy." Practically speaking, a subsidy exists whenever an individual receives benefits in excess of the fees paid by that individual to enjoy those benefits. Another way of expressing this would be to view it as an income of wealth transfer. This kind of income redistribution does not necessarily involve the actual transfer of cash. For example, in the case of a recreation user who pays no fees or only a nominal fee to use the National Forest, the user is receiving a considerable benefit without having to pay the full actual cost of providing that benefit. Since the source of the Forest Service recreation management funds is the public treasury, it could be said that all recreation users on the National Forest are being subsidized. Viewed from this perspective, almost all of the use and enjoyment derived from the Coronado National Forest could be considered to be a subsidy. This kind of subsidy would include virtually all developed recreation use, dispersed recreation use, skiers, bird watchers, wilderness users, hunters and fishermen, all downstream water users who benefit from watershed management, private property owners who benefit from Forest Service fire protection programs, range permittees, firewood users, anyone who uses a Forest Service road, etc. The potential list of Forest users who could be considered to be the recipients of a subsidy or income transfer is practically endless. Under the existing rules of our society, the public sector provides many such subsidies which touch the lives of all citizens. The ultimate decision of who receives a subsidy and who pays rests with the elected representatives of the people, in other words it is a political decision. The U.S. Forest Service, as

Agency response to
R & J Associates
(continued)

custodian of public trust lands, operates under authorities granted by the U.S. Congress and is not empowered with the authority to make the ultimate decision of who is subsidized and who pays. In summary, the subsidy issue which you raise is indeed a critical issue. However, it should be remembered that range permittees are but one among many National Forest users who receive benefits in excess of costs necessary to produce and distribute those benefits.

You may be correct in that livestock grazing permittees could increase economic gains for themselves and the general economy by getting into another business, however, it is not our mandate to counsel people on their livelihoods. Perhaps, many of us could do better elsewhere, however, economics is not always the only consideration in what we choose to do.

While we agree that overgrazing has changed the Arizona landscape over the years, we cannot agree that the Coronado is a poor Forest for grazing. The Coronado has some of the most productive rangeland in the Southwestern Region. Much of the Forest occurs in higher rainfall zones than most people living in the desert basins are used to. Approximately 84 percent of the suitable rangeland is already in satisfactory or better condition.

2. You are correct in saying the Coronado is a recreation forest. Within an anticipated annual budget of $6,000,000 (1980 base), nineteen percent would be spent on recreation management; ten percent on range management, and three percent on management of timber and fuelwood resources. In addition, much of our trail maintenance is accomplished by volunteers. The only reason a higher percentage is not spent on recreation resources is the total budget constraint and the need to provide at least basic management for other resources. It should be noted that timber and fuelwood harvest on the Coronado is done primarily to benefit wildlife and recreation resources which in turn provide recreation opportunities.

The purpose of the Forest Plan policy for managing motorized vehicles is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

The Forest Plan does provide for repair of recreation facilities in the Santa Catalina Mountains. These needs were shown in Table 9 of the Draft Plan. The table was misleading because it indicted the only need was to reconstruct water systems. This only applied to the first five sites listed. This table has been corrected in the final document.

Improvements at the Mt. Lemmon winter sports area were financed by the permittee and not the National Forest.

We share your concerns about maintenance (or lack thereof) of recreational facilities on Mt. Lemmon. We have made recent adjustments in priorities for management and it is our intention that past problems do not reoccur.

3. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

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Agency response to
R & J Associates
(continued)

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The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

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The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

4. The proposed reconstruction of the General Hitchcock (Mt. Lemmon) Highway is for safety and maintenance needs. The road will be maintained as a scenic highway. It will be reconstructed within the existing alignment and to the existing standard of two lanes with a 30 MPH design speed. A separate environmental analysis addressing site specific concerns for the road has been conducted. The analysis indicated use on Mt. Lemmon will not increase significantly due to the planned improvements. Use will in-

Agency response to
R & J Associates
(continued)

crease as the result of population growth in Pima County and the surrounding area. The road is not the means by which to regulate or manage the users of the mountain. The highway is the means to transport all of the people safely to their destinations on the mountain.

The Forest Service has considered other transportation alternatives for the mountain, and will continue to evaluate these. Neither the Coronado National Forest nor Pima County has the funding necessary to subsidize public transportation on Mt. Lemmon. Any alternative would have to be self supporting. Mt. Lemmon is very different from Sabino Canyon because there are private dwellings on Mt. Lemmon and because the road is a public highway. We do not have the options of closing this road or charging for use as we did in Sabino Canyon. No matter what transportation alternatives become available, the Mt. Lemmon Highway will be needed.

5. We agree that identification and designation of appropriate RNAs is important and believe the Coronado N.F. can be justifiably proud of leading the Southwestern Region in that effort. We have more RNAs than any other Forest and with our proposed additions, will have represented all targeted types on this Forest.

Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually precludes or severely restricts most resource uses, including recreational activities.

We have carefully reviewed all proposed Research Natural Areas and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out each special area. We recognize that the entire National Forest is a unique place and worthy of special care.

It is important to bear in mind that the RNA program is national in scope and not limited to National Forest lands. It is not necessary or even desirable to have every vegetative type within the Coronado N.F. represented by RNAs on this Forest. Better representatives may well exist elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

Zoological and/or Botanical Areas have been proposed for areas where truly unique biological resources are in need of special management emphasis to accommodate public use and enjoyment of them. Most of the Coronado is biologically unique and our overall management emphasis is aimed at preservation of these qualities of the land. The ZBA designation has been reserved for those special areas where more than ordinary management emphasis is required. Such areas are identified in the plan, and others were considered as suggested by various respondents.

0690

COMMENTS

Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

All comments must be received by the Coronado National Forest no later than

________________________.

Please print or otherwise write legibly - Thank you.

Comments: Concerning my choice of alternatives for Coronado National Forest use. I would like to see proposal D emphasized Being as conservative with our environment as possible, I feel, is the most rewarding plan.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 8 - 1985
RECEIVED

Name: Thomas Val Rauh

Date: 10/8/85

Address: 3737 E. Fairmount Ave.
TUCSON, Az. 85716-3712

Agency response to
Thomas Val Rauh

All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

E.I.S. Comment

0606

Portal Ariz.
October 5, 1985

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 9 - 1985
RECEIVED

Forest Supervisor
Coronado Nat'l Forest
Tucson, Arizona

Subject: E.I.S = CNF

I have diligently read the proposed Plan for Coronado National Forest and the Summary of the Draft Enviormmental Impact Statement for the Coronado National Forest.

Alternative A has the best workable achievements in this Coronado National Forest Proposed Plan.

Alternative A has the best approach to
wilderness areas. There are enough
designated wilderness areas in Southeast
1 Arizona. I would like to see Bunk
Robinson, Whitmire Canyon and Mt Graham
Put back into multiple use status forever.
No Z B A's would be established.

Alternative A has a more realistic
dollar figure for roads and trails and
also for Purchase of right of ways for
roads and trails. Rather than spend
2 money on right of ways Why not
Construct roads across FS land

2 to the desired locations. This would
help with Forest Service management
and be a real blessing to the
general public.

Altermative A would prevent development
of the Astrophysicel site on Mt Graham.
I am detinitely opposed to the Astro-
3 physical Proposal. Just another handful
of People desiring a big mountain top
for there small project. We need
this area for its timber, summer
and Winter recreation also multiple use.

Altermative A has the best fuelwood,
timber and Wildlife Proposel. Fuelwood
and timber will be Provided on a
4 Sustained yield basis. Grazing
management will decrease wildlife—
livestock Conflicts.

Altermative A has the best statement
concerming riperian areas for the total
36,000 acres. If the riperian area has
5 high value then the total riparian
area should be managed differently
than the grazing allotment. I do
not want to see each riparian
area fenced. I believe there

is a better way. Fencing is very
expensive and trouble to maintain.
Fences and cattleguards discredit the
5 beautiful natural landscape and the
Visual Quality objectives are not
agreeable with same people.

Alternative A has the best
grazing statement. Balance permitted
6 grazing use with grazing capacity.
This part of management is long
over due.

My past experience with the
forest service tells me all these
figures concerning dollars is too
far out of reality. Wood roads
Costing $18,000 per mile, Storage
building = $19,000, work center = $25,000
7 office = $320,000, utility water =
$350,000.00. I would think the
Forest Supervisor could adjust
these dollar figures or change
Priority management direction.

I do not like the Corondo
National Forest Fire Management
Program and Philosophies, it stinks
to high heaven.

Here on the Douglas District we have a large desirable plant community consisting of about 1000 plant speices and I believe Arizona has about 1600 plant species. For this small area to have 5/8 of all the plants found in the state of Arizona it shows anyone we have a large variety of plants and this is due to Fire Control Not Fire management. I don't know of any declining wildlife habitat. As for reducing suppression cost the Dougles District has had very low suppression cost

8 for many past years. Is this due to Fire Control or Fire management! From what I have observed on these prescribe fires it cost more to burn the area than it would to Control a wildfire on the same area. Any way I don't like the Fire Alternatives of the Coronado National Forest. What a waste of time and money.

We wrestle not against flesh and blood, but against principalities, against Powers, against the rulers of the darkness of this world, against Spiritual Wickedness in high places.

I'll be wetching the Forest Service and hoping for the best alternative.

Sincerely
Lonnie E Rawdon

Lonnie E Rawdon
P.O. Box 117
Portal, AZ
85632

Page 5

Agency response to
Lonnie E. Rawdon

1. The Forest Plan designates nonwilderness management for the Bunk Robinson and Whitmire Canyon Wilderness Study Areas. The Mt. Graham WSA is recommended for wilderness designation. Since wilderness use is considered one of the multiple uses, any Forest areas remaining essentially roadless would have to be reevaluated for their wilderness suitability when the Forest Plan is redone in ten to fifteen years.

2. Much of the needed rights-of-way are to gain access to the Forest boundary from other public routes. There are a number of places where access to the Forest is blocked by private land, for example, there is only one legal access point to the Whetstone Mountains. In some cases existing roads provide access to the Forest across other ownerships, but for which we do not hold a legal right-of-way. Building roads solely on National Forest land would not achieve the access objective and would be far more expensive than acquiring the needed rights-of-way. However, both options are available to us for dealing with specific right-of-way cases.

3. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

4. The Forest Plan also provides a sustained yield of fuelwood and timber. The Plan predicts a timber yield twenty-five percent higher than Alternative A. Alternative A predicts a fuelwood harvest ten percent higher than the Plan. The Forest Plan will also decrease wildlife-livestock conflicts.

5. We certainly agree that riparian areas need special management considerations, because they are more sensitive to grazing and other land uses than surrounding lands. Because of the linear nature of these areas, it would be very expensive to fence each one. As you point out this is not really a very desirable solution, even if it were feasible. The Forest Plan would attempt to solve grazing related riparian problems first through improved range management practices, and where that fails through exclusion of livestock. We recognize that some riparian areas are too sensitive to tolerate any grazing. The Forest Plan includes criteria to identify these extra sensitive areas.

6. All alternatives in this plan will bring about a balance between grazing capacity and permitted livestock use within two decades of implementation. We feel that the strategy outlined in the Forest Plan best balances the need to produce goods and services for the American public with budgetary constraints and environmental concerns.

7. Any cost estimates shown in the Forest Plan represent our best estimate of costs based in terms of 1980 dollars. As individual projects near construction, more detailed analysis will be accomplished to further assess project need and costs. Most facility construction shown is needed for all alternatives to meet basic management needs. Reassessment of future management needs, reducing budgets, etc. could force us to reprioritize implementation of specific projects.

8. Fire control (suppression) is still an essential part of fire management. The new policy gives managers more latitude in determining when direct and immediate control is needed versus using natural barriers and weather conditions to confine a wildfire to a predetermined area. Fire management also includes the use of prescribed fire to meet resource management objectives. We disagree that it costs more to burn an area under prescrip-

Agency response to
Lonnie E. Rawdon
(continued)

tion than it does to directly and immediately suppress a wildfire of the same size that is burning out of prescription. Experience over the last few years indicate that total fire management costs, including suppression, have gone down in relation to total acres burned.

August 13, 1985 0075

Dear Sir:

This letter is in regard to the Summary of the Draft Environmental Impact Statement for the Coronado National Forest Proposed Plan. The draft as it is written leaves questions because of understanding. While there are various proposals, I found it somewhat difficult to distinguish between them. With this in mind, my feelings are expressed without support of one specific proposal.

1 As a permittee on the National Forest, I find it interesting that over 84% of the suitable grazing land is in satisfactory or better condition. I would like this figure to be more highly publicized. The forest service and ranchers both know the negative publicity that is received by grazing in general. It is time that some responses are made showing that we aren't the destroyers that the environmentalists would like to make us out to be. Better publicity of the cooperator relationship should be emphasized that exists between the forest service and the permittee. It is time to publicize the fact that in the Coronado National Forest, most of the revenues are created by grazing. A percentage of this money is for range betterment, and this creates a better habitat for both cattle and wildlife. The positive aspect of increased forage production thru range betterment should be emphasized. If there is more vegetation, there is more room for all animals.

2 Recreation is something that will increase. I believe most ranchers don't mind others enjoying the scenic outdoors. It is the abuse of the land from off-road vehicles which leave scars that last for years, littering, and destruction of things we have built that makes us angry. Again, maybe better publicity would help.

So to end this portion, I think a direction for the Coronado National Forest to head is one that publicizes the good about grazing. An approach that continues to try to make the land produce with the knowledge that there is not much else economical that can be done with it. It is my feeling that if grazing is improved, then wildlife, recreation, and the aesthetic beauty are all improved.

3 My biggest objection to the draft is the proposed electronic site for Castle Dome. I think it is getting ridiculous the number of mountains around Tucson and elsewhere, that have some kind of installation on top of them. Castle Dome has a unique feature for the Santa Rita Mountains in that it doesn't have a road. It has a rugged peaceful appearance that is not made for dominance by some kind of tower or piece of metal. I think that the forest service ought to quit putting up towers, etc. everytime someone wants to make a dollar. There is a microwave tower approximately one mile away with a road already to it. There is no need for more roads or mountains [illegible] there be a few mountains unscarred in Southern Arizona.

Joe B. Robinson, DVM
Box 511
Sonoita, Arizona 85637

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
AUG 15 1985
RECEIVED

Agency response to
Joe R. Robinson, DVM

1. We take pride in the fact that about 84 percent of the Coronado's grazing lands are in a satisfactory condition. This is due to a long and productive partnership between the Forest Service and the grazing permittees. The need to get this message to the public and to counter some of the adverse publicity surrounding grazing use of the public lands has been a concern of ours. The Forest Service has worked with the extension service, other federal and State agencies, the cattlegrowers organizations and the Society for Range Management in an attempt to get this information to the public. We appreciate your support for this effort, and would be receptive to any suggestions about how to better accomplish the goal.

2. The purpose of the planned policy is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

   The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

3. Although the Forest Plan and EIS identify potential electronic sites, including Castle Dome, additional site specific analysis will be required before they could be occupied. The current analysis only identifies them as being suitable for future electronic needs. Additional analysis would determine the extent and types of development that is compatible with other resource uses. We will consider the information you have provided us in any future site planning.

DOUGLAS RANGER D[illegible]

Received 9-20-85

	Action	Info.	Initials
DFR			
BMA			
PAY CLK			
RES CLK			
RANGE			
R&L			
REC FOR			
REC TECH			
[illegible]			
AFO			
RGE & [illegible]			
WL BIO			
PORTAL			
[illegible]UCKER			

COMMENTS

0505

Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

All comments must be received by the Coronado National Forest no later than ______________.

Please print or otherwise write legibly - Thank you.

Comments: I would like to have fishing available in the Cave Creek area.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 2 1985
RECEIVED

Name: pat Rogers Date: 8/25/85

Address: 2130 W. Peralta
Mesa, Az. 85202

Agency response to Dolt Rogers	The Forest Plan calls for maintenance of John Hands and Herb Martyr Lakes for trout fishing. This will be expensive and recurring and we may find it difficult to finance. Perhaps a group of citizens such as yourself may wish to contribute to the effort to keep these waters silt free.

COMMENTS

0506

DOUGLAS RANGER DISTRICT
Received 9-20-85

	Action	Info.	Init.
DFR			
EMA			
PAY CLK			
RES. CLK			
RANGE			
RBL			
RE PO			
[illegible]			
PMO			
AFO			
[illegible]			
WL BIO			
PORTAL			
TUCKER			

Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

All comments must be received by the Coronado National Forest no later than
________________________.

Please print or otherwise write legibly - Thank you.

Comments: I like your new plan for the Cornado National Forest, and really approve of your reommendations for South Fork remaing open for public use.

Sincerly,
Kerri Rogers

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 2 1985
RECEIVED

Name: Kerri Rogers
Date: 8/25/85

Address: 2130 W. Peralta
Mesa, Az. 85202

Agency response to Kerri Rogers

Thank you for your support of the planned management of the South Fork of Cave Creek.

All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

COMMENTS

0507

Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

All comments must be received by the Coronado National Forest no later than

______________________.

Please print or otherwise write legibly - Thank you.

Comments: I would like to state that I agree
with the Coronado Plan for the most part.
However, I feel that more picnic areas should
1 be established for the public. I also feel that
2 the area at South Fork should remain open
to overnight campers. I also would like to
3 see more fishing available.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 2 - 1985
RECEIVED

Name: Sheila Rogers

Date: 8/25/85

Address: 2130 W. Peralta
Mesa, Az 85202

Agency response to Sheila Rogers

1. The Forest Plan recognizes a need for additional recreational facilities, including picnic sites, in the National Forest. Table 8 in the Draft Plan displays the recreation site construction priorities.

2. Cave Creek is recognized nationally as an area having plants and animals, particularly birds, which are not commonly found in the United States. Annually, thousands of visitors come to the Cave Creek Area in hopes of viewing these unique species.

   Most of the people visiting the area desire to stay for several days, camping on the Forest. Many of these potential campers arrive in large recreational vehicles. The Cave Creek drainages are narrow and there are few suitable sites for campgrounds. Presently, there is one small campground in the South Fork drainage and three campgrounds in the Main Fork drainage. The South Fork campground has a capacity of twenty people at one time. The three campgrounds in the Main Fork have a combined capacity of 140 people at one time. The stay limit is fourteen days at all sites. In addition, there are two picnic sites in the Main Fork. Because of the topography, there are no opportunities to expand existing sites or construct new sites. There are no special facilities for recreational vehicles.

   During the most popular bird watching periods, the demand for recreational facilities far exceeds the supply of available facilities. As a result, the existing sites have been damaged, some by overuse. This is particularly severe at South Fork where vehicle control has been inadequate.

   The most popular area for viewing birds is in the riparian area adjacent to the road up the South Fork to South Fork Campground. People commonly use the road to hike up the drainage often creating conflicts between pedestrians and vehicles.

   The Forest Plan provides for designation of the South Fork as a Zoological and Botanical Area under 36 CFR 294.1. Since the purpose of a special designation is to provide recognition and special management to facilitate public enjoyment of a unique resource, the Forest Plan prescribes management of the South Fork ZBA to accomplish this purpose. The South Fork Campground will be converted to a day-use-only picnic ground. This will allow more people to use the recreational facility near the ZBA than would be provided by continued overnight camping with a fourteen day stay limit. The Forest Plan will meet more of the recreation demand than is currently being satisfied. We believe that day use is the most appropriate recreation policy for the ZBA. Also, the Forest Plan provides for installation of barriers in the South Fork site to prevent further damage and speed bumps on the access road to reduce conflicts between pedestrians and vehicles. These vehicle controls will be installed in 1986. Detailed management standards and guidelines are displayed in the Plan under Management Area 14.

3. Although the Forest Plan does not identify any new fishing lakes, the existing ones will be maintained for their fishing opportunities. Some lakes, such as John Hands and Herb Martyr, may be difficult to maintain because of continuous silting problems.

DOUGLAS RANGER D.
Received 10-7-84
Action Info. Initials
DFR
BMA
PAY CLK
RES CLK
RANGE
R&L
REC FOR
TECH
FMO

0684

September 26, 1985

To:
Douglas Ranger District
RR # 1, Box 228 R
attn. Bud Brunner
Douglas, AZ 85607

Dear Bud,

The deadline for public input on the management plan for South Fork of Cave Creek Canyon in the Chiricahua Mountains is coming close. Again we want to express how important it is to manage South Fork in a way to preserve its special status as a Riparian Habitat for the unique flora and fauna it inhabits.

We are in favor of designating the South Fork Area as a
1 Zoological-Botanical Area, to restrict traffic on the existing
road and to close the hiking trail to ORV use. The camp-ground
should be used as picnic area only, as stated in the preferred
management option. We do not understand why there will be a
collecting permit for plants required as long as grazing is
2 allowed and as long the roadsides are not protected from plant-
collecting because of the "buffer-zone". Under these circum-
stances the stipulation for a collecting permit has no meaning
besides a barb against researchers and we are against it.

Since the goal of the management plan is to preserve the
habitat for the flora and fauna of South Fork there have to be
3 some means to monitor the effect of hunting, trapping and other
use of the area, on the wildlife.

We appreciate the efforts of the Forest Service to work with the public. Yet there are not many alternatives to do the right thing to ensure a future for our forests and our wildlife. During the next 50 years we will experience a doubling of our population. Now we have to decide if we want to have natural areas left and what state they will be in.

Thank you for your understanding,

Barbara Roth + Vincent Roth

Barbara Roth and Vincent Roth
Box G
Portal, AZ 85632

Vera M. Walters
SWRS
Portal, Az.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 8 - 1985
RECEIVED

Agency response to
Barbara and Vincent
Roth, and
Vera M. Walters

1. Cave Creek is recognized nationally as an area having plants and animals, particularly birds, which are not commonly found in the United States. Annually, thousands of visitors come to the Cave Creek Area in hopes of viewing these unique species.

   Most of the people visiting the area desire to stay for several days, camping on the Forest. Many of these potential campers arrive in large recreational vehicles. The Cave Creek drainages are narrow and there are few suitable sites for campgrounds. Presently, there is one small campground in the South Fork drainage and three campgrounds in the Main Fork drainage. The South Fork campground has a capacity of twenty people at one time. The Three campgrounds in the Main Fork have a combined capacity of 140 people at one time. The stay limit is fourteen days at all sites. In addition, there are two picnic sites in the Main Fork. Because of the topography, there are no opportunities to expand existing sites or construct new sites. There are no special facilities for recreational vehicles.

   During the most popular bird watching periods, the demand for recreational facilities far exceeds the supply of available facilities. As a result, the existing sites have been damaged, some by overuse. This is particularly severe at South Fork where vehicle control has been moderate.

   The most popular area for viewing birds is in the riparian area adjacent to the road up the South Fork to South Fork Campground. People commonly use the road to hike up the drainage often creating conflicts between pedestrians and vehicles.

   The Forest Plan provides for designation of the South Fork as a Zoological and Botanical Area under 36 CFR 294.1. Since the purpose of a special designation is to provide recognition and special management to facilitate public enjoyment of a unique resource, the Forest Plan prescribes management of the South Fork ZBA to accomplish this purpose. The South Fork Campground will be converted to a day-use-only picnic ground. This will allow more people to use the recreational facility near the ZBA than would be provided by continued overnight camping with a fourteen day stay limit. The Forest Plan will meet more of the recreation demand than is currently being satisfied. We believe that day use is the most appropriate recreation policy for the ZBA. Also, the Forest Plan provides for installation of barriers in the South Fork site to prevent further damage and speed bumps on the access road to reduce conflicts between pedestrians and vehicles. These vehicle controls will be installed in 1986. Detailed management standards and guidelines are displayed in the Plan under Management Area 14.

   Direction has been added to Management Area 14 to restrict motor vehicle use to the existing road.

2. The plant collection policy applies to Management Area 14 because of the special emphasis placed on management of flora as well as fauna. The "exempted" areas along the road and recreation site are minimal in size and are already impacted by the facilities themselves. Because collecting permits would be required of all users, we see no "barb" against researchers. To our knowledge, livestock have not consumed or otherwise destroyed the types of plants that should be emphasized and that would be of interest to collectors. It is our intent to make permit requirements and availability as simple as possible. The Plan has been revised to include more detailed guidelines on issuing plant collection permits.

3. The Forest Plan does provide for monitoring the effects of all uses over the entire Forest. The extent and intensity of monitoring in each individual area will depend on the potential for resource damage and conflicting uses. This potential for conflict certainly exists within the South Fork of Cave Creek.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

OCT 15 1985

RECEIVED

0669

Santo Niño Ranch
P.O. Box 1386
Nogales, AZ. 85621

10/10/85

USDA Forest Service
Coronado National Forest
300 West Congress St.
Tucson, AZ. 85701

Subject: Summary Draft Environmental Impact Statement
Proposed Coronado National Forest Plan

Dear Sirs:

This note is in the form of comment on the subject plan.

We strongly support alternative A as outlined in subject draft paper.

Although I am a permittee, neither my neighboring permittees nor I were ever advised of these proposed plans, until we were alerted by our local Cowbelles Chapter.

Sincerely,

Sam Sedgwick for Santo Niño Ranch

Sam Sedgwick

Agency response to Santo Nino Ranch

Thank you for your input to the Coronado National Forest Plan. The Forest planning began in 1978 and has been delayed since then for several reasons. Initially all Forest permittees were contacted regarding their concerns and suggestions. Unfortunately some permits, such as yours, have changed hands during the intervening years. We apologize if you did not receive notice of availability of the 1985 Draft Plan and EIS. We thank the Cowbelles Organization for alerting you and others to the review of the Proposed Plan.

All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

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0203

August 27 1985

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

AUG 29 1985

RECEIVED

Forest Supervisor
Coronado National Forest
Tucson, Arizona 85701

Dear Sir

Thank you for the Summary D.E.I.S. for the Coronado National Forest.

I have visited Coronado often on our trips to Arizona and have a real interest in its survival.

I read the Summary twice and have studied the alternatives.

My feelings are in favor of the Proposed Action which seems to be a fair treatment of all the problems and in the best interest of all concerned.

My greatest fear is the abuse of the forest by overuse in both recreational and commercial use. Especially such things as off road vehicles to name just one.

Thanks again for the paper work and I hope my thoughts are of some help.

Sincerely
George A. Scheffel

GEORGE SCHEFFEL
1971 PARKSIDE DR
CONCORD CA 945[illegible]

Agency response to George Scheffel

All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

COMMENTS

0052

Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

All comments must be received by the Coronado National Forest no later than

______________________.

Please print or otherwise write legibly - Thank you.

Comments: Your proposed plan meets with my approval except that over-night camping should be continued.

Paul R. Scheier
Paul R. Scheier
Box 773
Douglas, AZ 85608

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
AUG [illegible] 1985
RECEIVED

Name: Paul R. Scheier

Date: August 8, 1985

Address: Box 773, Douglas, AZ 85608

Agency response to
Paul R. Scheier

We appreciate your support of the Forest Plan.

Both day use and overnight use recreation sites can be found throughout the Coronado National Forest. In some specific sites, the increased recreation demands have necessitated a shift from providing both day and overnight use to day use opportunities only. These changes have been necessary to accommodate more total users within the capacity of the sites.

Cave Creek is recognized nationally as an area having plants and animals, particularly birds, which are not commonly found in the United States. Annually, thousands of visitors come to the Cave Creek Area in hopes of viewing these unique species.

Most of the people visiting the area desire to stay for several days, camping on the Forest. Many of these potential campers arrive in large recreational vehicles. The Cave Creek drainages are narrow and there are few suitable sites for campgrounds. Presently, there is one small campground in the South Fork drainage and three campgrounds in the Main Fork drainage. The South Fork campground has a capacity of twenty people at one time. The three campgrounds in the Main Fork have a combined capacity of 140 people at one time. The stay limit is fourteen days at all sites. In addition, there are two picnic sites in the Main Fork. Because of the topography, there are no opportunities to expand existing sites or construct new sites. There are no special facilities for recreational vehicles.

During the most popular bird watching periods, the demand for recreational facilities far exceeds the supply of available facilities. As a result, the existing sites have been damaged, some by overuse. This is particularly severe at South Fork where vehicle control has been inadequate.

The most popular area for viewing birds is in the riparian area adjacent to the road up the South Fork to South Fork Campground. People commonly use the road to hike up the drainage often creating conflicts between pedestrians and vehicles.

The Forest Plan provides for designation of the South Fork as a Zoological and Botanical Area under 36 CFR 294.1. Since the purpose of a special designation is to provide recognition and special management to facilitate public enjoyment of a unique resource, the Forest Plan prescribes management of the South Fork ZBA to accomplish this purpose. The South Fork Campground will be converted to a day-use-only picnic ground. This will allow more people to use the recreational facility near the ZBA than would be provided by continued overnight camping with a fourteen day stay limit. The Forest Plan will meet more of the recreation demand than is currently being satisfied. We believe that day use is the most appropriate recreation policy for the ZBA. Also, the Forest Plan provides for installation of barriers in the South Fork site to prevent further damage and speed bumps on the access road to reduce conflicts between pedestrians and vehicles. These vehicle controls will be installed in 1986. Detailed management standards and guidelines are displayed in the Plan under Management Area 14.

0678

COMMENTS

Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

All comments must be received by the Coronado National Forest no later than

______________________________.

Please print or otherwise write legibly - Thank you.

Comments: I approve of the plans you have proposed for South Fork in Cave Creek. I spend a lot time there and enjoy the area very much, as do a lot of other people.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 7 - 1985
RECEIVED

Name: Judy Scott

Date: October 4, 1985

Address: 286 W. Palomino Dr. #106
Chandler, AZ 85224

Agency response to Judy Scott

Thank you for your interest in the Coronado National Forest and support of the planned management for the South Fork of Cave Creek.

COMMENTS

0679

Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

All comments must be received by the Coronado National Forest no later than

______________________________.

Please print or otherwise write legibly - Thank you.

Comments: I agree with the plans you have proposed for South Fork in Cave Creek. I feel that this a realistic plan and can be implemented. I do have some reservations about not allowing over night camping in the Camp Ground in South Fork. 1

2 I do feel that we all need to assist the Forest service by contacting our Congressional people to provide the money to update the roads. If there is anything we can do to assist the Forest Service, please call on us.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 7 - 1985
RECEIVED

Name: Teresa E. Scott

Date: October 3, 1985

Address: 858 - 14th St.
Douglas, AZ 85607

Agency response to
Teresa E. Scott

1. Cave Creek is recognized nationally as an area having plants and animals, particularly birds, which are not commonly found in the United States. Annually, thousands of visitors come to the Cave Creek Area in hopes of viewing these unique species.

   Most of the people visiting the area desire to stay for several days, camping on the Forest. Many of these potential campers arrive in large recreational vehicles. The Cave Creek drainages are narrow and there are few suitable sites for campgrounds. Presently, there is one small campground in the South Fork drainage and three campgrounds in the Main Fork drainage. The South Fork campground has a capacity of twenty people at one time. The three campgrounds in the Main Fork have a combined capacity of 140 people at one time. The stay limit is fourteen days at all sites. In addition, there are two picnic sites in the Main Fork. Because of the topography, there are no opportunities to expand existing sites or construct new sites. There are no special facilities for recreational vehicles.

   During the most popular bird watching periods, the demand for recreational facilities far exceeds the supply of available facilities. As a result, the existing sites have been damaged, some by overuse. This is particularly severe at South Fork where vehicle control has been inadequate.

   The most popular area for viewing birds is in the riparian area adjacent to the road up the South Fork to South Fork Campground. People commonly use the road to hike up the drainage often creating conflicts between pedestrians and vehicles.

   The Forest Plan provides for designation of the South Fork as a Zoological and Botanical Area under 36 CFR 294.1. Since the purpose of a special designation is to provide recognition and special management to facilitate public enjoyment of a unique resource, the Forest Plan prescribes management of the South Fork ZBA to accomplish this purpose. The South Fork Campground will be converted to a day-use-only picnic ground. This will allow more people to use the recreational facility near the ZBA than would be provided by continued overnight camping with a fourteen day stay limit. The Forest Plan will meet more of the recreation demand than is currently being satisfied. We believe that day use is the most appropriate recreation policy for the ZBA. Also, the Forest Plan provides for installation of barriers in the South Fork site to prevent further damage and speed bumps on the access road to reduce conflicts between pedestrians and vehicles. These vehicle controls will be installed in 1986. Detailed management standards and guidelines are displayed in the Plan under Management Area 14.

2. Thank you for your support and offer of assistance.

COMMENTS

0662

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 15 1985
RECEIVED

Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

All comments must be received by the Coronado National Forest no later than

October 11, 1985

Please print or otherwise write legibly - Thank you.

Comments:

~~1 PA (proposed Action)~~
~~2.~~ A (current)
~~3~~ B (RPA)

To R. B. Tippeconnic

My first choice is ~~PA~~ A for a number of reasons:

~~1~~. It seems the most likely to suceed and the best over all plan.

Doris Seibold
P.O. Box 625

Name: Doris Seibold

Date: October 10, 1985

Address: P.O. Box 625
Patagonia, Arizona
85624

Agency response to Doris Seibold

All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

DOUGLAS RANGER DISTRICT
Received 9-20-85

	Action	Info	Initials
DR			
BMA			
PAY CLK			
RES CL.			
RANGE			
R&L			
REC FO.			
REC TECH			
FMO			
AFMO			
RGE CL.			
WL BIO			
PORTAL			
RUST			

COMMENTS

0504

Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

All comments must be received by the Coronado National Forest no later than

_______________________.

Please print or otherwise write legibly - Thank you.

Comments: I am in agreement with your Preferred Proposal For The Coronado National Forest Plan particularly South Fork. It was a real Pleasure To see the Cooperation between The Forest Service and the Public and it was great Seeing you Mr. Tippeconnic and your Staff at the open House in Douglas. I can assure you we will be trying to get support From our Congressional delegation For Improving Mountain Roads in Arizona and perhaps we can bring them comparable to Roads in New Mexico National Forests

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 2 - 1985
RECEIVED

Name: Margaret Shannon

Date: September 16, 1985

Address: 858 - 14th Street
Douglas, Az 85607

Agency response to Margaret Shannon	Thank you for your continued interest in management of the Coronado National Forest. We greatly appreciate the time and effort expended by yourself and others in helping to develop a management plan for the South Fork of Cave Creek. We will look forward to working with you to find answers to the many challenges facing all of us.

OCT 10 1985

0661

To whom it may concern:

We feel that the plan for the Coronado National Forest should remain "Status Quo".

We strongly oppose any activity that will farther restrict public use of these lands,

Such as:

Dedicating it as a national monument,

Any extensive, new road development,

And especially, the construction of any type of Astrophysical facilities.

As we feel that this last proposal would restrict use in the areas of hunting, camping with open fires, and possibly limit driving at night in the facilities' general area.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 15 1985
RECEIVED

Steve Shiflet Rt 1, Box 281, #158
Safford, AZ. 85546

Richard Travis Box 1181
Morenci, Ariz. 85540

Jerry D. Burkett Box 656
Morenci, Ariz 85540

Gerald D. Burkett 105 Maricopa
Morenci, Ariz. 85540

Van Pugh 722 Johnson
Thatcher, AZ. 85552

Karen Shiflet Rt 1 Box 281 #158
Safford, Az 85546

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 15 1985
RECEIVED

Agency response to
Steve Shiflet,
et. al.

The question of establishing any portion of the Coronado National Forest as a National Monument is outside the scope of this Plan. National Monuments are managed by the U.S. Department of Interior, National Park Service.

The transportation system for the Coronado National Forest is considered to be adequate at this point. Road management emphasis will be on maintenance and reconstruction of existing roads. The Forest Plan predicts only ten miles of new roads for fuelwood access will be needed during the life of the Plan.

Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

0043

SIERRA CLUB

Grand Canyon Chapter · Arizona

3357 North Grannen
Tucson, AZ 85745

August 2, 1985

R. B. Tippeconnic
Forest Supervisor
Coronado National Forest
FB #42
300 West Congress
Tucson, AZ 85701

Dear Mr. Tippeconnic:

The Grand Canyon Chapter of the Sierra Club is very concerned about the proposed astrophysical observatory on Mt. Graham, in the Pinaleno Mountains. We understand that this is a very complex issue, and we wish to analyze all the available data before deciding on a formal Sierra Club policy. We therefore intend to await the release of the Observatory Draft Environmental Impact Statement this fall before formally commenting on the proposal. In the meantime, however, we do have one request concerning the current Coronado Draft Forest Plan, and a list of specific concerns relating to the proposed observatory that we hope will be addressed in the forthcoming DEIS.

It is obvious that even though the proposed observatory will take up only a portion of the top of the Pinaleno Mountains, its presence and size will greatly affect the character and use of the entire range. The Mt. Graham observatory, if it is built, will have both direct effects such as the construction of a commercial power line and winter plowing of the highway, and indirect effects such as altered visitation rates. A rational Forest Management Plan would necessarily have to account for these effects. It seems both illogical and premature to discuss a management plan for the Pinalenos while the observatory question is still up in
1 the air. We therefore request that the Pinaleno Mountains be removed from consideration in the present Draft Forest Plan and EIS, and that the Management Plan for the Pinalenos be developed separately, simultaneously with or after the completion of the development of the observatory proposal. The Pinaleno plan should then be discussed in a future DEIS that would include a range of alternatives on the proposed observatory, including of course a no-observatory option.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
AUG [illegible] 1985
RECEIVED

2 Following is a list of concerns that we feel must be specifically addressed in the observatory DEIS:

- The effects of the proposal on wildlife, especially black bear, spotted owl, and the Mt. Graham Spruce Squirrel.
- The effects of a variety of alternative levels of winter disturbances, ranging from the full observatory proposal of snow-plowing and tourist access, to a no action alternative of letting snow close the road, to a complete Forest Service closure. In addition, the effects of the observatory's proposed use of Sno-Cats should be specifically evaluated.
- The effects of a range of alternative levels of visitor control, including closing the High Peak road to all unofficial traffic, year-round.
- The effects of various visitor facility options and increased visitor traffic to the mountain. We feel that this increase in traffic may be extremely detrimental to the mountain, and would like to minimize it. The possibility of confining all tourist centers, etc., to the town of Safford and making actual visits to the site difficult, such as at Mt. Hopkins, is appealing to us and should be studied in detail.
- The effects of diesel generator noise, and ways to minimize their impact.
- The need for aerial tramway. We have discussed this issue with Steward Observatory officials. They have neither a need nor any desire for such a tramway, and feel it will in no way help their development plans or eliminate their need for wintertime road access. The environmental consequences of such a tramway are clearly disastrous, and without an overwhelming need, we feel that the whole idea should be dropped from consideration.
- The likelihood and effects of increased helicopter traffic.
- The question of funding for the National New Technology Telescope (NNTT). This telescope is clearly the cornerstone of the entire observatory plan, constituting almost 40% of the cost of the entire proposal. Yet it has not been decided that Mt. Graham is the preferred site for the NNTT, and we have some indication that the telescope will be built on Mauna Kea. This throws some doubt on the whole need for a Mt. Graham observatory in the first place. Perhaps it is premature to discuss an observatory on Mt. Graham until this question is decided.

3
- The effects of various alternatives for Wilderness designation. The Sierra Club sees the Wilderness question as one of the most important issues in the Mt. Graham area. Our first concern is

that no area should be dropped from Wilderness consideration before the observatory issue is completely settled. We therefore ask that all Pinaleno Mountain decisions be postponed until the observatory DEIS is complete, as discussed above.

3 The Sierra Club would like to see the maximum amount of Wilderness possible. If a power line or aerial tramway corridor is deemed necessary, we would hope that the vast areas on either side that have already been shown appropriate for Wilderness be designated as such. Furthermore, we feel that there are some areas, especially near the proposed observatory site, that although not formally designated WSA's have significant Wilderness values and should be considered for designation.

Another question that remains is the fate of the 3500 acre astrophysical reservation should part or all of it be deemed unnecessary for the proposed observatory. We have discussed
1 this question with Peter Warshall of the Office of Arid Land Studies, and he indicated that this question was not going to be addressed in the Observatory DEIS. This is clearly an important question that needs to be answered before we can make an intelligent decision on the proposal. We feel strongly that much of this land may be suitable for Wilderness designation in the event that no observatory, or a smaller observatory, is built.

* * *

These are a few of the Sierra Club's concerns at the present time. We would like to know your opinions on the various issues we've raised, especially with regard to the scheduling of decisions on the Pinaleno Mountains section of the plan.

Sincerely,

Jake Turin

Jake Turin
Chair
Mt. Graham Study Committee

JT/ay

Agency response to
Sierra Club,
Grand Canyon
Chapter

1. Management decisions for the Pinaleno Mountains have been made for all areas not directly affected by the proposed Mt. Graham Astrophysical Area. The only area directly affected is the 3500 acres originally proposed by Steward Observatory. Management direction for this entire 3500 acre area will be addressed in the Mt. Graham Astrophysical EIS. That EIS will contain a range of development as well as nondevelopment options, including wilderness for roadless areas within the 3500 acre area. Standards and guidelines developed from the analysis documented in the Mt. Graham Astrophysical EIS will be incorporated in the Forest Plan when the decision on land use for the 3500 acres is made.

2. Your comment(s) on the Proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

3. The allocation decision for the Mt. Graham Wilderness Study Area is being made in the Forest Plan. The Forest Plan was revised to recommend wilderness for all 62,000 acres of the WSA. Our analysis and public comment now indicates there are no conflicts between this wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development of no development. ,Roadless portions of the Pinaleno Mountains outside the WSA were not considered for a wilderness option.

SIERRA CLUB

0633

Grand Canyon Chapter · Arizona

10/10/85

R.B. Tippeconnic, Forest Supervisor
Coronado National Forest
300 West Congress
Tucson, Az. 85701

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 11 1985
RECEIVED

Dear Mr. Tippeconnic,

1 I want to take this opportunity to express my deep appreciation for all the time and effort your staff has given to accomodate Sierra Club concerns and input. The past 3 years have been rewarding and educational. The current Plan is much improved over the 1982 version, and we are looking forward to a continuing relationship with your staff as the planning documents are put to actual use.

2 It seems hardly necessary to repeat things which were so clearly expressed in our comments on the 1982 Plan and expanded upon in our Citizens' Alternative. For obvious reasons, we would prefer to see Alt. D implemented with some changes. Some of our positions have evolved since we presented our alternative to the Forest, and the computer perverted other aspects of our real intentions with its limitations of analysis and expression.

3 We now oppose any astrophysical development on MT. Graham. 4 We support "intensive management" in certain situations and under certain conditions; but we oppose further distribution of cattle into unused ranges and we oppose vegetative manipulation for the express benefit of livestock.

5 For the record, we support, nay we insist, on a wilderness recommendation for maximum acres of all three W.S.A.'s. Consult your public comment files on these areas from the 1976 RARE II

5 days, the 1982 Plan, & the roadless area re-evaluation for a full and consistent picture of public will. These areas are perfect candidates with no conflicts and overwhelming public support.

6 I would like to officially request that our recommendations, as expressed in our written Citizens' Management Alternative on file in your office, be added as a supplement to the comments which follow. Our Citizens' Alternative has comments relating to vegetative manipulation, watershed management, grazing and other resource issues which are still pertinent to this Plan. We would like those comments entered along with this official Sierra Club comment as input on the current Plan and E.I.S. If you need a supplemental copy of that document, please contact me and I will provide you with one.

Thank-you again for the opportunities to participate in public forest management. We are looking forward to your response to the following specific criticisms and suggestions.

Sincerely,

Paul W. Hirt

Paul Hirt, Conservation Chair
Grand Canyon Chapter, Sierra Club
1038 N. Perry
Tucson, Az. 85705

GRAZING

We are very pleased with some of the changes between the 1982 Draft Plan and this current one in regards to range management. In particular, we are satisfied with the intention to align cattle use with capacity within the first two decades- as opposed to the sixty years proposed in 1982. This is a major step forward which we strongly support.

In relation to this we have some concerns, however:

1. Proposed alignment of use and capacity should have unequivocal precedence over proposed numbers of permitted use.

2. Under no circumstances should use exceed capacity on any area of any allotment after the first two decades.

Explanations:

7

1. We are skeptical that the forest can achieve the goal of balance within twenty years by the methods prescribed. According to the Plan, balancing use with capacity is strongly dependent on improvements in range condition and capacity, which are in turn based largely upon intensive management systems. The Sierra Club has always been critical of the Forest's faith in the efficacy of certain intensive management practices, particularly type-conversion projects. We are also skeptical that major improvements in riparian areas and badly managed ranges can frequently or effectively occur without either exclusion or major reductions in cattle numbers.

To balance use with capacity, the Plan calls for both a reduction of use and an increased capacity. If capacity does not increase as expected under proposed management systems, then balance will not occur within the projected time frame. There is no contingency plan for such a situation in the Forest Plan. There is no indication whether the goal of balance has priority or if the total permitted use goal does.

We would like to see a commitment in the Final E.I.S. indicating that balancing use with capacity has manifest priority over other goals related to grazing.

8

Monitors to indicate achievement of goals are inadequate and frequency of evaluation as well as contigency plans are less than minimal or completely lacking. The Sierra Club appreciates the goal but has grave concerns about it's implementation.

9

2. The official response of the Forest in the event that goals fail to be achieved is to "evaluate" and make revisions to the Plan. This can easily lead to a situation where needed improvements are simply delayed by readjusting goals and time frames.

The Forest has been overgrazed since before the turn of the century and attempts have been made at reform and range rejuvenatetion repeatedly since 1905. The process has been laboriously slow and largely ineffective. Politicization and lack of public knowledge and concern have contributed. It is now time to speed up the effort to manage the public rangelands as required (in the Taylor Grazing Act, P.R.I.A., N.F.M.A. and F.L.P.M.A.) as range conservation principles dictate. 9

The Sierra Club would like to see a much more substantial committment in the Final E.I.S. to abiding by the twenty year goal without recourse to extensions through revision of the Plan. Otherwise it is business as usual with good intentions buried by political considerations or the selfish resistance of those affected.

We have two further criticisms regarding the use and capacity issue. The 1982 Plan had a projected ceiling grazing capacity of 311 M.A.U.M.'s. Now, just three years later, the ceiling is 360 M.A.U.M.'s, a 16% increase. There is no additional funding (probably less than projected in 1982) and no real change in management intensities (both Plans call for high amounts of level D) and no real change in conditions on the ground to explain this difference.

Even more disconcerting is the fact that the projected trend in range capacity changed significantly between the two Plans. In 1982 it decreased during the first two decades then slowly rose to a peak of 311 M.A.U.M.'s. Now the Plan projects a steady increase in capacity from the beginning to a peak of 360 M.A.U.M.'s. 10

The only explanation the Forest has for these radical differences is that "some old data was revised." We are skeptical. While condition and trend is difficult to determine with 100% accuracy, it is doubtful that a few revisions would have such a great impact, particularly on trend estimates which do not fluctuate as readily as range condition.

It is largely a result of this realization of the alterability of future condition and trend data that we are insisting on the above commitments to balance. We do not see how a Forest that was projected to be still overgrazed after fifty years with 311 M.A.U.M.'s is three years later projected to be in balance after 20 years with 338 M.A.U.M.'s. Your figures are highly questionable.

We believe, however, that the important issue is the end of overgrazing. A greater emphasis on this commitment will alleviate our skepticism concerning your data.

11 We also object to the continued over-emphasis on livestock grazing. According to the Plan (p. 14) the Forest is currently overstocked by 20%. Rectification of this problem, as well as future increases in cattle use, depend on management which often seeks to distribute cattle out to not utilized or under-utilized ranges. The result is an increase in both numbers and distribution... more cows in more areas.

12 The federal range program runs a massive deficit. Ranchers are subsidized by artificially deflated permit fees. Cattle grazing has been the chief cause of watershed degradation, soil erosion, riparian instability, range vegetative type-conversion, desertification and the general destruction of native grassland ecosystems. Ranches contribute little or nothing to rural economies. Intensive range management is cost inefficient and of very dubious public value. Why does the Forest continue to emphasize cattle grazing to such a degree?

13 We would like to see cattle use dropped below capacity in the future. We would like to see cattle limited to those areas which can be managed more cost effectively. And we would like cattle distribution actually decreased.

14 One flaw in the D.E.I.S. was that a very narrow range of alternatives was proposed regarding range management, despite our requests for low use and no grazing alternatives.

Page 45 of the D.E.I.S. displays outputs for all alternatives. The six alternatives analyzed in the D.E.I.S. have a median permitted use at the end of period 5 of 383 M.A.U.M.'s. All alternatives are within 7% of that median. The Plan basically seeks to maximize grazing within the given budget limitations.

15 There is an insufficient emphasis on rejuvenation of degraded conditions due to overuse. You repeatedly state a goal of improving watershed conditions to "satisfactory or better by the end of the year 2030," (page 79 D.E.I.S. and elswhere). This is unacceptable. This goal should match the balancing of cattle use and capacity by achieving satisfactory conditions by the end of the second decade.

16 On page 65 of the Plan, M.A.4 calls for only 74,000 acres of unsatisfactory range conditions to be improved, out of a total of 196,000 in unsatisfactory condition. This is unacceptable.

On page 70 of the Plan, M.A.7a calls for less than 700 acres out of 3,700 acres of unsatisfactory condition to be improved. M.A.7b calls for no improvement of the 1,712 acres that are unsatisfactory.

"Improved conditions" should be based on a standard of healthy, diverse, stable and naturally productive ecosystems. "Satisfactory" should be better than fair condition. Conditions should not be considered satisfactory unless they are producing at least 75% of natural capacity for key indicator species. These indicator species should be chosen for their representation of diverse, stable and healthy range conditions and not for their palatability to cattle.

17 Page 85 of the Plan discusses the Guadalupe Canyon Z.B.A. There are too many cattle and too intensive a use for this area. Also, the current condition is too negatively impacted by overuse. Reductions are in order.

18 As previously mentioned, the monitoring plan is inadequate. Monitoring is often too infrequent, evaluations are only required after too great a divergence in projections has occurred, and there is no specific direction for evaluations and rectifications.

In summary, there are many good intentions in this current Draft Plan, but we need more guarantees that those good intentions will be aggressively pursued. There is still too great an emphasis on domestic livestock production and too little an emphasis on degraded resource rejuvenation and protection of watershed and riparian areas. Finally, the monitoring plan is not adequate to ensure that goals are or will be achieved.

WILDLIFE

The Sierra Club endorses a policy of National Forest management based on the objective of maintaining a standard of healthy natural communities. We appreciate the efforts made in this direction in the proposed Coronado National Forest Plan. However, several points of concern remain.

Habitat representation

19 We support wilderness recommendation for all Wilderness Study Areas. To protect the natural diversity of ecosystems in the Coronado National Forest it is particularly important that all capability areas (CAs) be well represented in wilderness. Representative portions of each CA should also be protected by special area designation (Research Natural Area (RNA) or Zoological-Botanical Area (ZBA)). Currently, a number of CAs are poorly represented in wilderness:

CA	Acres in Forest	Acres in Wilderness	Acres in RNA
10R	4,669	480	---
3P	28,102	67	---
4M	930	62	---
6PS	30,201	987	---
8M	309	183	---
9DHM	1,962	---	---
?*	?	---	---

*Roughbark Arizona cypress forest (Redfield Canyon, Bear Canyon (Santa Catalina Mts.), Sabino Canyon, Cave Creek, Rucker Canyon).

20 Of these CAs, FORPLAN printouts indicate that only small portions of two may occur in WSA's considered in this Forest Plan--184 acres of CA 4M and 264 acres of CA 9DHM, both in the Mt. Graham roadless area. We are not sure if these acres are included in the portion of this area recommended for wilderness; we urge that they be included.

21 Currently only six of 27 CAs are represented in RNAs or ZBAs. The proposed Forest Plan adds three new RNAs and two ZBAs. It is difficult to establish from the descriptions in the Plan exactly which CAs these areas represent. We strongly urge that any of the CAs not adequately represented in wilderness at least have some acreage protected by one of these special designations. More generally, we recommend that all CAs have acreages protected as RNA or ZBA. We are disturbed by the statement that "Mt. Graham wet meadows do not represent vegetative types that are targeted for representation by the Coronado National Forest in the Regional Plan" (p. 117, Proposed Plan DEIS). We see no harm in some duplication in special area representation. To the contrary, RNAs within

21 the Coronado Forest are very important as a basis for assessing local environmental trends. As is noted in the Proposed Plan (p. 13), "as future use of natural resources increases, the options for designating RNAs will diminish." Immediate identification and designation of appropriate areas is therefore critical.

Riparian areas

22 Because of their importance both in stabilizing watersheds and as critical wildlife habitat, riparian areas require special protection and attention. For both 7A and 7B riparian areas, we would like to see developed a definition of old growth. These areas should be managed for a very high proportion (80 - 90 %) of old growth. It is possible that the objectives outlined in the proposed plan (to maintain both primary and secondary cavity nesters at 90 - 100 % of the levels in untreated stands) would accomplish much of the objective to maintain old growth. Grazing should be eliminated from all riparian habitats. We recommend that criteria be developed through which particularly critical riparian stands could be placed completely off limits to fuelwood harvest. Such stands would be designated on a case by case basis. In general, documentation and continued recording of the health and condition of the riparian ecosystems in the Coronado Forest should be enhanced.

Wildlife monitoring

23 The Forest Plan presents a wildlife monitoring program based on the concept of indicator species. Population trends of these species are supposed to indicate the health of various ecosystem components in the Forest (riparian associations, dense canopy, herbaceous cover, etc.). However, the majority of the indicator species are either very restricted in range (e.g. grey hawk, trogon, rose-throated becard, etc.) or are game species which are not necessarily representative of any particular habitat types. Thus, we feel that the indicator species list as currently porposed does not adequately provide a basis for monitoring the various ecosystems in the Forest.

Instead, we propose that a monitoring program based on 'species models' be instituted, as we understand is occuring for other Arizona National Forests. In this system, indicator species, or groups of species, are designated which represent each of the different habitat types (CAs). For example, Cassin's sparrow (*Aimophila cassinii*) might be an appropriate indicator species for grasslands with scattered shrubs (CA 3P), whereas grasshopper sparrows (*Ammodramus savannarum*) might be a better indicator for regions of this CA containing few or no shrubs (Bock and Webb, J. Wildlf. Mgmt. 48(3): 1045-1050, 1984). We do not have suggestions for a comprehensive set of species models; however, we urge the Forest Service to incorporate into the Forest Plan a commitment to develop such a list. Indicator species should be monitored annually, particularly for populations occuring in the vicinity of vegetation manipulations.

24 As a complement to the indicator species, we also support the use of vegetation models to monitor the health of CAs. Vegetation models have two advantages. First, vegetation structure is likely to reflect the long-term impact of the types of disturbances likely to occur in the Cor-

24 onado Forest (mining, fuelwood harvest, grazing, off-road vehicles, etc.). Second, vegetation structure is less subject to natural fluctuation than are animal populations, which can exhibit wide natural variations. Vegetation structure could be monitored less frequently than indicator species populations (every 5 years).

SOIL & WATERSHED

It is correctly stated on pg. 7 of the Proposed Coronado Forest
Plan,"..much of the water used in Southern Arizona and New Mexico
originates on the mountain watersheds of the Coronado." It also
correctly states the issue to resolve is, "Management of forest
resources to protect or enhance watershed condition from both a
hydrologic function and soil productivity standpoint." Unfortu-
nately the Proposed Action Alternative inadequately addresses
resolution of the issue. Throughout the Plan the water yield
figures are for run-off and the analysis of the impacts of alter-
native actions are for run-off yield. In reality, Southern
Arizona residents make little use of water run-off (stock tanks
being an exception.) Groundwater is the primary source of water in
25 Southern Arizona and the Coronado N.F. Plan does not address
groundwater recharge (quantity or quality.) The immediate elimi-
nation of overgrazing and an expeditious improvement of range
condition would best improve the quantity of ground water recharge.
The elimination of the use of herbicides and pesticides (which the
Plan emphasizes) would improve the quality of ground water recharge.

Some items in the Draft EIS that are unacceptable and need revision
are:

1 - pg. 110, par.4 under SOIL declares, " All alternatives, acheive
a satisfactory or better watershed condition on all watersheds by
Period 5." Future Trends on pg. 79 reiterates essentially the
same goal.The population in the Coronado region is projected to
double prior to the end of period 2 and groundwater is already
being seriously overdrawn. The Coronado N.F. is a major contributor
to the regions water supply. Watershed and ground water recharge
must be improved before the end of Period 2 as much as possible.
26 You declare on pg. 124 (par. 4, Social Effects) that, "One of the
basic objectives of Forest management is the promotion of community
stability." Your plan appears to use this to justify prolonging
land abuses such as overgrazing which benefits only a few people.
Your perspective of community stability is suspect. Watershed and
groundwater recharge is important to the community stability of
100% of the regions population.

27 2 - under Benefit Values, pg.229; you use the full market value of $13.12/AUM but use $39.60/acre foot for water yield (a small percentage of market value - do you know any Tucson residents who can purchase water for $39.60/acre foot? and the cost of water is accelerating!) Permitted grazing use above capacity should be assigned a negative, not a zero benefit value to compensate for damages. If you used correct benefit values and projections, your FORPLAN outputs would shift significantly away from grazing and toward watershed. You stated differences in PNV among alternatives did not occur from valuing soil loss - you obviously did not assign an adequate cost to soil loss because it is very important.

28 3 - Potential Water Yield Increases, pp. 221-222 - You state that most of the water increases are "not significant," but you conveniently do not quantify the potential acre feet. 0.5-2.4 inches per acre increase per year if assigned an accurate benefit value and when compared to current yields of .14-1.30 inches/acre per year. By your figures it appears that we can more than double our yield but you state potential increase is insignificant.It doesn't appear that improving watershed was complimentary to your prograzing bias.

29 4 - Unsatisfactory range allotments, pg.192, defined as stocking at least 20 percent overstocked. The grazing over watershed bias shows again. You gave the ranchers a free 20% in the definition. 5-20 % overgrazing can have disastrous cumulative effects on watershed. Unsatisfactory should be anything over 100% of capacity.

30 In Summary - The Plan does not address groundwater recharge and does not accurately value soil and watershed benefits. Soil and water quality and quantity are undervalued in the plan and suffer from overprioritization of grazing. The planned overgrazing impacts ground water recharge and soil loss. Planned use of herbicides and pesticides to support grazing threaten groundwater quality. USFS management should minimize soil erosion and maximize groundwater recharge quantity and quality.

FUELWOOD

31 The Coronado National Forest Proposed Action Plan continues to project a fuelwood harvesting level that is detrimental to wildlife populations and diversification, soil and watershed values, scenic and primitive recreation values (EIS pp.78 & 109.) The projected harvest level apparently is to open up woodlands for grazing and big game hunting. Pp. 15-16 of the Proposed Plan projects that timber and fuelwood cutting will improve recreational and wildlife objectives. Be honest, you mean big game hunting, not the diversified wildlife (mostly non-game) base the forest has naturally without roadbuilding and timber/fuelwood cutting. Alternative D offers the most realistic compromise between other resource values and fuelwood harvesting.

32 Fuelwood harvesting criteria were not well defined in the Plan. It should be conducted within the following guidelines:

1 - No new roads should be constructed to provide additional fuelwood harvesting.

2 - Fuelwood harvesting must not negatively impact watershed values or increase soil erosion.

3 - Permit fees should cover all of the Forest Services costs associated with fuelwood harvesting(no deficit sales.)

4 - Fuelwood harvesting must not impact wildlife diversity and population levels, and must have no negative impacts to threatened and endangered species. This would preclude any fuelwood harvesting in riparian areas.

5 - Fuelwood cutting must be managed on a sustained yield basis.

RECREATION COMMENTS

1) There should be a greater emphasis on recreational opportunities. Trails are disappearing, developed sites are degrading, overuse in certain areas is chronic, and access is often a problem. Recreational demand will only increase.

There is an immediate need for improved trail access and signing, particularly in high use areas like Pima Canyon, Ventana Canyon, Linda Vista trail, and others. 33

2) The more restrictive rules for motorized vehicles established for the Santa Catalina district should be adopted on all parts of the Forest. All motorized travel should be restricted to established roads only. Foot trails should be off limits to any motorized travel. 34

3) We oppose high-level developed recreation facilities in sensitive areas of the Forest, such as Madera Canyon and Cave Creek. Development of recreational facilities should be secondary to protection of environmental quality. 35

Recreational visitor carrying capacity should be determined for all high-use and/or sensitive areas of the Forest. Visitor facilities in these areas should emphasize light use and educational opportunities. Large visitor centers, R.V. parks, etc. are inappropriate. 36

SIERRA CLUB

Grand Canyon Chapter · Arizona

Proposed Citizens' Management Alternative
for
Coronado National Forest Draft Land Management Plan

June, 1984

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SUMMARY OF FOREST-WIDE MANAGEMENT EMPHASES

CORONADO NATIONAL FOREST CITIZENS' MANAGEMENT ALTERNATIVE

A Emphasize recreational opportunities especially wildland and dispersed opportunities.

B Improve watershed and range conditions.

C Establish optimal conditions for habitat types and wildlife species.

Specific Objectives Related to Computer Model Constraints

1- Emphasize dispersed recreation opportunities. Minimize road building in designated "roadless areas". Roadless areas recommended for wilderness by the Arizona Wilderness Coalition that were not included in the Arizona Wilderness Act of 1984, should be managed with a wildland recreation emphasis. Provide a moderate amount of developed recreation sites based on the rapidly increasing demand for Forested recreation areas. (A level similiar to Alt. B in the 1982 Draft L.M.P. is acceptable.

37

2- Strive for optimum condition on all watersheds.
  a) Improve all currently unsatisfactory watersheds to satisfactory condition by end of 50 year planning horizon.
  b) Improve all currently satisfactory watersheds toweard "optimal" condition by end of 50 year horizon.
  c) Maintain a "non-degradation constraint" for all watersheds; i.e.: no management activity may degrade any watershed beyond the span of one 10-year period, and no watershed improvement for a specific area may be made at the expense of watershed quality for a larger surrounding area. (diffusion of a condensed problem is not acceptable as a final solution to unsatisfactory watershed conditions.)

3- Protect "wet" (11AR and 12R) and "dry" (10 R and 11 BR) riparian areas through special management emphases.
  a) Exclude livestock from perennial streams.
  b) Subordinate fuelwood harvest in wet and dry riparian areas to the greater goals of wildlife habitat enhancement and recreation.

38

4- Strive to improve all rangeland conditions to "good" or better by end of 50 year planning horizon.
  a) Balance livestock grazing capacity and livestock use by the end of the second 10 year period (end overgrazing).

b) Maintain livestock use of available rangeland forage at a maximum use level of 15% - 30%. Utilize non-intensive and cost-efficient management practices. (Emphasize level B livestock and range resource management, prohibit levels D and E.)

39 c) Subordinate livestock grazing to the greater goals of rejuvenation of the range resource, wildlife habitat, watershed protection and recreation.

40 5- All capability areas should be well represented in special area designations; ie: wilderness, Research Natural Areas and Zoological Botanical Areas.

6- Manage fuelwood harvest on a sustained basis in currently accessible areas - as constrained by other resource emphases.

CITIZENS' MANAGEMENT ALTERNATIVE:
RANGE PROPOSAL

GOALS:

1) Eliminate overgrazing (align use with capacity) before the end of the second 10-year period.

41 2) Improve all range conditions to "good" or better by the end of the 50-year planning horizon.

3) Define and seek to maintain healthy, naturally diversified rangeland communities Forest-wide, and emphasize wildlife, watershed and recreation, with livestock and fuelwood harvest subordinate.

4) Emphasize level B livestock and range resource management. In areas of traditional over-use where additional management intensity is needed to improve range conditions, level C may be applied. (See Appendix A for definitions of livestock and range resource management levels).

42 5) Exclude cattle from perennial riparian areas to protect streamside ecology, promote wildlife and recreation values and encourage greater water quality and quantity. (For the Coronado Forest, these would be in 'capability areas' 11AR and 12R - see Appendix B for definition of capability areas).

43 6) Improve all unsatisfactory watersheds to satisfactory condition, and prohibit further degradation of any portion of any watershed (see watershed proposal).

CONSTRAINTS:

1) Constrain for a range budget within 10% of average range budget of past 10 years, adjusted for inflation. (The 1980 budget which was higher than years before it and after it may suffice.)

2) Livestock grazing should be subordinate to other multiple-use values such as wildlife, watershed and recreation.

44 3) **Levels D and E livestock and range resource management and herbicides for vegetative manipulation should not be used.** (See Appendix A).

45 4) No increase in permitted use may exceed capacity at any time. Permitted use may increase as capacity rises, but only subject to the greater goal of rejuvenation of the range.

MISCELLANEOUS RECOMMENDATIONS (may apply to several or all alternatives in the Forest Planning process):

1a) Not exceeding permitted use beyond capacity for cattle on the range is a minimum goal and legal requirement. Right now, according to Forest figures, use exceeds capacity by 30%. Waiting 40-50 years or more to merely align use with capacity (as in the previous Draft E.I.S. alternatives) is an avoidance of responsibilities. One or more alternatives should align use and capacity as soon as is practicable, in view of the fact that grazing permits are 10-year renewable contracts. The goal of this citizen's alternative is to align use and capacity before the end of the second ten year period. The reason for this is that within those first two periods, every grazing permit on the Forest will have come up for renewal twice. Necessary reductions in permitted use can be shared between the two renewals rather than all at once, giving permittees an opportunity to plan for these temporary reductions. If the Final Plan is implemented in 1985, then use and capacity would be aligned no later than the year 2005.

1b) Not only should use and capacity be aligned as quickly as possible, but one or more alternatives should seek to maintain permitted use at moderate to low levels. We consider a 'low' level to be 15%-25% forage utilization on that portion of the range which does not require extensive grazing systems and livestock improvements. The range budget wou ld go to efforts to restore the range resource to its optimum natural condition. We consider a 'moderate' level to be 25%-30% forage utilization on that portion of the range which would require only non-intensive, cost-efficient, current budget constrained management practices.

2a) Range condition and capacity was not assigned a goal in the Regional guide. It was also undervalued in the cost-benefit analyses of the previous Draft Plan. A full capacity range - one that is in optimum natural productive condition - is obviously a valuable asset with benefits accruing not only to livestock production potential, but to wildlife, recreation, wilderness, soil stability, watershed and visual resources. The costs of improving conditions were figured into your analyses, but the benefit values both in terms of priced outputs and "non-quantifiable considerations", were left out (D.E.I.S. pgs. 29, 35, 38). Even though the Forest has no direct control over assigned values, it should encourage this broader view of range values.

46 2b) "Range capacity" is a term with two meanings which should be distinguished and clarified. On the one hand, it refers to the natural biological capacity for forage of the individual range eco-systems. On the other hand, in practice the Forest defines it as the real capacity of the land to sustain cattle, which is dependent on the level of management maintained in order to get the livestock out to unused or underutilized forage. The former should be termed "range capacity" and the latter termed "livestock capacity". All alternatives should set the goal of attaining this full "range capacity", not just aligning use with capacity. This goal should be independent of "livestock capacity", not confused with it. The Forest is equating range management with livestock management here. It is one thing to seek to improve range conditions - degraded by over a century of livestock abuse - by seeking to restore the full natural biological capacity of the rangeland to sustain grassland communities. It is another thing to pump tax dollars into a range program which seeks to increase the level of livestock capacity of the range, by adding fences,

46 water developments, manipulating vegetation and moving the cattle into more and more peripheral ranges. The latter is how the Forest defines range capacity in the Forest Plan. Range capacity should be clearly distinguished from livestock capacity both semantically and in practice. The natural biological capacity of the range should be defined, and a goal set for acheiving 90% or better of that natural capacity. That would seem to us to be a resource goal. In addition, a commodity output goal for livestock production should be considered separately from range resource and capacity goals.

2c) The range analyses should take into account the fact that cattle are often browsers as well as grazers on the Coronado (as well as all overgrazed ranges), eating such things as mesquite, ironwood, jojoba and other chaparral species. The Forest is correct in not increasing AUM capacity because of available browse, but it should be more diligent in assessing the amount of browse utilized. This information should be accomodated into the range analyses, for without it, capacity calculations would be inaccurate. For example, an allotment with an established forage capacity of 100 AUM's might in reality only have 80 AUM's of forage capacity plus browse. Type-conversion projects which eliminate chaparral (browse species) could actually decrease AUM capacity.

47 3a) Vegetation, soil, watershed and wildlife among others are the range resources, not cattle. The emphasis should be on improving and maintaining the health, diversity and productivity of range resources, with livestock production subordinate. As it is, the Forest has been manipulating the management objectives to fit the grazing system, rather than vice versa. We would like to see the Forest re-orient priorities from commodity management to resource management, consistent with the National Forest Management Act.

3b) Your analysis shows that reduced grazing on the Forest would impact individuals, not communities (p. 55, right column, second paragraph). Maintaining excessively high levels of grazing way out of proportion with multiple-use values, is not justified in terms of rural economic stability. The loss of range capacity, wildlife and habitat, recreational and scenic values, continued unacceptable levels of soil erosion and watershed degradation, and the great cost of the Forest's range program are similarly unjustified by the relatively insignificant benefits provided by the cattle industry locally, statewide and nationally. We recommend that the needs, costs, benefits and environmental impacts of current grazing levels and practices be thoroughly analyzed, and a new directional priority be developed emphasing cost-efficiency and present net value, greater focus on recreational and non-consumptive activities and the rejuvenation of abused resources.

3c) An adequate assessment of the range land resources should include:

a-Definition of potential natural communities on all allotments and capability units.

b-A monitoring system that judges rangeland impacts by reference not to optimum capacity for cattle, but to the natural productive conditions of diverse, healthy biotic communities.

48 c-Consideration of:
total biomass productivity,
nitrogen economy,
populations of breeding and otherwise dependent vertebrates,
stability of consumer/producer communities at the base of the biotic pyramid, and
long-range climatic cycles.

4a) On the Coronado Forest, levels D and E livestock and range resource management should be minimized. For this citizens' management alternative, level C management should be the maximum intensity allowed and should be used sparingly. (See Appendix A for definitions of management levels). The Forest seems to favor improving range conditions by physically manipulating the vegetative resource to produce more forage, with few reductions in cattle numbers. This is premised on the belief that range can be successfully manipulated for the purpose of sustaining or increasing livestock use. It is our contention that particularly in regards to the Coronado Forest, this view is largely unjustified as well as economically infeasable. The idea is to get rid of "competing vegetation" and encourage the re-growth of grass in areas that have lost much of their original range qualities - due mostly to overgrazing. This competing vegetation (chaparral, sagebrush, pinyon-juniper, whatever) has often succeeded in these areas as a dominant species precisely because of the degraded condition of the range. Because of marked changes in soil and watershed conditions, wildlife populations and continued livestock overuse, the succeeded species - chaparral in the case of the Coronado - *is often the optimum vegetation for current conditions;* ie., it is in ecological balance so to speak. Removing the chaparral and planting grass will often create an imbalance, seeking an improbable reaction from the existing eco-system, and the condition often worsens. The fact is, the areas most in need of "intensive" management are often the very areas incapable of sustaining any type-conversion activity. The bulk of experimental evidence does not support the contention that removal of competing vegetation will result in a *sustained-yield* of forage - particularly if the vegetative manipulation is accomplished for the purposes of supporting maximum loads of domestic livestock. In addition, the costs of this type of "intensive" management (levels D & E) are generally cost-inefficient and prohibitive, while equal or greater benefits accrue from lowering permitted use and utilizing "extensive" (level C) management techniques.

49 4b) A comprehensive range rejuvenation program focussing on soil stability and watershed impro vement with reduced or mitigated livestock impacts, is the most sensible and cost-efficient approach, and would provide the preatest multiple-use benefits. We recommend that intensive management levels D and E be minimized and that type-conversion projects aimed at forage improvement be restricted to specific sites where feasability has been extensively evaluated. The Sierra Club would like to be informed of and involved in the planning and evaluation of any and all forage improvement type-conversion activities in the Forest. Enviornmental impact Statements should be required for all projects involving the use of herbicides in vegetative manipulation; indeed, we recommend a ban on the use of all pesticides in this citizens' management alternative (unless and until all health hazard questions have been answered fully and risks to human health and the environment reduced to near zero.). See section on Vegetative Manipulation for more discussion of this issue.

5) Cattle have serious detrimental effects on streamside ecology, which can be remedied by their exclusion from riparian areas. All riparian zones with perennial water on the Coronado should be managed for wildlife habitat and dispersed recreation and have cattle excluded by fencing. The Coronado's fish habitat I.D. data can be used to identify qualifying "perennial" streams.

The following sources of public comment were utilized in the compilation of this "Citizens' Management Alternative" - derived from the files of comments on the 1982 Draft Coronado Plan:

IN-0695-85743, IN-0703-85704, IN-1107-98072, IN-1147-85761, IN-1243-85705, OG-0009-20005, OG-0012-85034, OG-0014-85741, AG-0032-85007, AG-0031-85023, AG-0026-87102, AG-0016-94102, AG-0012-87102

VEGETATIVE MANIPULATION

The planning team has correctly identified vegetation manipulation as an issue of public concern (DEIS, 3), but has incorrectly decided (Plan, 14) that the Proposed Action would "resolve issues and concerns" and eliminate the need for a change in current management direction. The Plan also errs in characterizing the issue as where and how much manipulation will be done. The public concern is at least as much about how and why, questions which are ignored in the Plan (though addressed in the Analysis of Management Situation (AMS, 115). Far from resolving these issues, the Plan tends rather pointedly to ignore or evade them.

Even the statement that no change in management direction is indicated is misleading; how can going from proactically no herbicide use to potential use on 65% of the Forest be considered no change in management direction? Although in the past "chemical control for manipulation of vegetation has received very little use in terms of number of applications and areas affected" (AMS, 208), the AMS states that "a change in Forest direction to a strategy which maximizes forage production would be necessary to produce all assigned targets" (AMS, 116), and this is the course chosen in the Plan, which is "predicated on a widespread use of herbicides" (AMS, 116) despite public opposition to chemical use (AMS, 115).

Strong public concern about chemical control methods is one of the major reasons why vegetation manipulation is identified as a regulatory issue. One of the major problems with the Proposed Plan is its failure to bring the Forest chemical use profile into focus during discussions of alternatives. This failure leaves the public unsure and suspicious about how chemicals are to be used on the Forest.

For instance, the Plan seems to limit vegetation management to a component of Level D Livestock Management (Plan, C-2-2; DEIS, 3); can the public be satisfied, then, that chemical use on the Coronado will not extend to non-range activities? Evidently not, for the Plan also states in a section on wildlife that herbicides can be used in lakes (DEIS, 75). Turning to the 1981 Situation Analysis, we find that chemicals may also be used for wood harvest, wildlife habitat, visual resources, reducing wildland fuels and in undefined "research projects" (AMS, 208). The reader begins to wonder if type-conversion, right-of-way spraying, site preparation and thinning of plantations and other common chemical practices aren't really obscured by such rubrics as "silvicultural system," "how should streams and lakes be classified," and "road and trail maintenance" (DEIS, 3-5).

The issue of forest chemical use is not limited to rangelands (unless, like the Forest Service, we identify nearly the whole Forest as range), but impacts most categories of forest management, including public understanding of and committment to planning goals. The public is often reluctant to accept many so-called "habitat improvements," for instance, due to concern about chemical use in such projects. Conversely, wilderness and natural areas are highly valued by the public in part because they are free from synthetic chemicals. The Plan should clearly display chemical control options in all areas of forest management, and address the issues thus brought to light. Instead of this we get a downgrading of (or, at the very least, a conscious inattention to) the chemical use issue throughout the two volumes of the Plan.

Consequently, chemical control possibilities seem to lurk behind many descriptions of proposed prescriptions, practices and activities (Plan, 31-108, B1-B3, DEIS, 135-139). Right or wrong, the public is led to suspect unstated chemical use in such phrases as "watershed conditions will be maintained or improved" (DEIS, 137-139); "available or reasonable predictable technology" (DEIS, 135-139); "non-disruptive research" (DEIS, 137-139); "habitat maintenance and improvement" to guess about the chemical implications of Prescription #40, which attempts to "maximize livestock grazing capacity" (DEIS, 139), nor about "grazing improvement activities...and improved range management" (DEIS, 73), though these appear in a discussion of wildlife and fish. A similar clarity should obtain throughout the Plan and its successors in regard to all management areas.

Such clarity would be especially helpful in the outline of management practices, activities and guidelines (Plan 32-108, B1-B3) where euphemisms and carefully neutralized jargon again serously diminish public perception of the actual, physical practices being described. The public ought not to have to guess what is meant by "restore damaged watersheds" (Plan, 67), "minimize onsite and downstream water pollution" (PLan, 67), "monitor the impact of research areas" (DEIS, 82), or "suitable rangeland" (DEIS, 72).

50 In the field and in the Plan, the scientific and ethical aspects of chemical use ought to be put clearly before the public, not relegated to the semi-secret realm of "those practices not generally understood by the public" (DEIS,42). The public is generally quite capable of understanding and dealing with chemical use issues (often better qualified than the commodity-oriented Forest Service), and is entitled to a clear presentation of the facts and implications pertaining to such use. Since the Forest Service seems to believe chemical treatments are a viable alternative in over half of its proposed management prescriptions, such clarification would be a significant means of truly resolving these issues and concerns.

Under the last federal administration, herbicide use proposals were to be carefully reviewed on a case to case basis under directive from the office of the Secreatry of Agriculture. That policy led to a well-considered reduction in herbicide use and proportionate increase in alternative control methods under the provisions of Integrated Pest Management. Under the present administration, review responsibilities have fallen to the Regional and Forest levels, where the review process has become more streamlined, the jargon smoother, the traditional Forest Service assumptions of no-risk programmed in. Nowadays the Forest Service commonly finds that chemical use proposals pose no significant impact and require no environmental analysis or public scrutiny when they entail small targets, or when they may be written off as experimental.

51 To the contrary, the state of the art being what it is, any chemical use on-Forest must be considered experimental with potential for significant impacts at every application. Especially in light of the 9th Circuit decisions in Merrell v. Block, SOCATS v. Watt, S.O.S. v. Watt, the Alaska Circuit decision in Alaska Survival v. Weeks, etc., it is clearly the responsibility of the Coronado to examine, on a site and chemical specific basis, the significance of risk to all exposed plant and animal populations, including the social and psychological effects on the public. EPA registration never has been a rubber stamp certification of no-risk, and is even more obviously not when that agency's funding has been drastically cut and its purview and credibility collapsed-situations that have improved very little in regard to FIFRA administration even with the appointment of a new EPA administrator. It is now more than ever up to the Forest Service to thoroughly assess the environmental hazard of chemicals it proposes to use.

The steps of these examinations should be clearly documented in the Plan, starting with a detailing of the chemical practices available under each management prescription and including full consideration of IPM techniques and alternatives.

Ideally, the Plan should allow the public and the land manager to see at a glance not only where and when chemical use could occur, but where and when it is most likely to occur, thus addressing a large part of the public's concern about where and how much manipulation may occur, and if it should; and if so, why, and how.

52 In general, the Plan should respond to public concern about chemical use by going beyond minimum legal requirements and past Departmental policies, which almost invariably favor commodity production over public opinion. For instance, unlike past decision-making, in the Plan true "No Action" should always be considered a viable alternative when chemical use or vegetation manipulations are being considered. It is generally recognized that chemical use is incompatible with management for wilderness, natural and botanical/zoological areas, aquatic habitat, and pure water. These exclusions are implicit in the first draft Plan and explicit in the 1981 Analysis of Management Situation. They ought to be explicit in the final Plan. Further, pesticide use anywhere on the Forest ought to be considered only as a last resort to achieve ends of overriding importance when other means are not available, and then only after approval by private citizens who own land within a 5 mile radius of spray sites, and by the general public via its representatives in some sort of agency policy-making body.

The Region 3 agreement with the Committee for IPM to involve the public in pesticide decision-making provides a possible model for decision-making on the Coronado. The Forest Service should set up a pesticide policy board composed of representatives from the agency, the state government, the chemical/agricultural/timber industries, academia, the enviornmental health profession, and the general public--the last category to comprise at least 50% of the voting membership on the board. The function of the board should be to review all pesticide proposals for the Forest no later than the EAR stage, and to advise the Forest Supervisor prior to issuance of EAs.

In any case, the limited ban on aerial application of pesticides imposed by Region 3 as part of the Committee for IPM settlement should become an absolute and permanent ban on the Coronado, except of course, in the standard exemptions for emergencies--which, it should not go without saying, ought to be strictly defined in the Plan. The goal of Forest management should be the maintenance and sustenance of naturally healthy, productive ecosystems. Synthetic toxins and type-conversions obviously are out of place here, even if they could by some magic be employed with due consideration for the "process of natural change" as required by NFMA 213 (g).

To summarize, the Plan should:

1. Allow use of pesticides only as a last resort.
2. Prohibit aerial application of chemicals.
3. Prohibit chemical control in fuelwood areas.
4. Prohibit chemical use in all areas where surface waters exist.
5. Prohibit chemical use in areas of critical breeding habitat.
6. Prohibit chemical use in developed recreation sites or prevent human entry to sprayed sites until all measurable residues have disappeared.
7. Prohibit chemical control of aquatic species.
8. Give more than obligatory lip service to Integrated Pest Management (Plan, 43,79; AMS, 177,208-209) by: 53
    - a) Reproducing in the Plan all relevant portions of departmental policies, directives and regulations on IPM, vegetation management and pesticides;
    - b) Expanding the list of alternative manipulations (Plan, Appendix C-2) to include methods not mentioned in the first draft Proposed Action; to wit,
        1. Manual methods (grubbing, scalping, girdling, harvesting, microenvironment modification, etc.);
        2. Biological methods (goats, swine, geese, cattle, sheep, insect predators and parasites, phytotoxic organisms, etc.);
        3. Mechanical methods (land imprinting, waterweed shading and cutting, shredding and chipping, etc.)

9. Involve the public in all chemical use proposals and vegetative manipulation proposals by:

   a) Setting up a pesticide advisory board to examine all such proposals and make recommendations tc the Forest Supervisor; at least 50% of said board to be composed of representatives from the general public;

   b) Obtaining written permission for all such proposals from all landowners within a 5 mile radius of the proposed sites;

   c) Notifying the general public and soliciting its comment at least 120 days prior to commencement dates of proposed projects;

   d) Posting spray sites for a minimum of 60 days prior to and 360 days following chemical application, the signs to include at least the following information:

      1. Date of application;
      2. Common and chemical names of chemical applied and rate of application;
      3. Known symptoms of acute and long-term poisoning;
      4. Names, addresses and phone numbers of people to contact for medical aid or more information.

10. Outline the decision-making steps involved in choice of chemical vs. non-chemical options, including (but not limited to):

   a) Definitions of the values and methodology for assessment of risk to capability areas, ecosystems, inhabitants and human beings on-and-off-site from primary chemicals and from their environmental products (including synergistic effects);

   b) Cost analysis of chemical use on non-livestock-related resources, including psychological impacts, avoidance behavior, etc., and costs resulting from forensic interventions in management.

54

   c) Description of specific capability area or ecosystem conditions under which chemical options would be preferred;

   d) Identification of potential chemical practices in all prescriptions where they may occur, not just range modifications as in the first draft;

   e) Consultation with health experts as well as the public and industries;

   f) Detailing of the monitoring procedures that will precede and follow chemical use and manipulations, including a display of treatment history on targeted and nearby sites and the results of previous residue monitoring;

   g) Use of best available technology for application and monitoring and regular public notification of monitoring results.

WILDLIFE:

SUMMARY OF GOALS

55 1. Wildlife should be a priority in forest planning. Forest management should be based on a standard of healthy natural communities.

56 2. All habitat types in the Coronado National Forest should be well represented in wilderness, RNA's, or ZBA's.

57 3. Prioritize multiple uses of forest lands to optimize wildlife, watershed, and recreation. For wildlife in particular, eliminate overgrazing (align use with capacity), , eliminate herbicide use as a means of range management, and improve monitoring of fuelwood harvesting (particularly in dry riparian (7B) habitats).

58 4. Protect all riparian areas.

59 5. Protect endangered species, avoid introduction of non-native species, and encourage revitalization of diminished populations of native species.

60 6. Monitor ecosystems through the improved use of indicator species and through habitat models based on vegetation structure.

CONSTRAINTS

1. Wildlife should be a major consideration in forest planning, not just a by-product of other concerns. The Coronado Forest should emphasize wildlife, watershed, and recreation, with livestock and fuelwood harvesting as subordinate concerns.

The unique value of the Coronado National Forest is its diverse assemblage of natural communities. The Coronado is a recreational forest, based on its natural diversity. Protection of this resource should be a priority in planning.

61

Towards this goal of maintainig natural diversity, optimal conditions for habitat types and wildlife species must be defined and sought. Current levels of produuction and disturbance should be identified. Current conditions are not necessarily optimal for all or even for any species. Forest management should be based on a standard of healthy natural communities. Perpetuation of this standard will insure continued productivity of the Forest into the future. Progress towards this goal can thus be thought of as analogous to a resource output.

62

2. All habitat types represented in the Coronado National Forest should be well represented in wilderness, RNA's, or ZBA's. Such designation of habitats is the best means of preserving natural community diversity and often is the most effective means of managing non-game wildlife species.

A consistent classification system must be used to describe the habitat types in the Forest. We utilize the capability area (CA) classification (Appendix A), and reference these habitat designations to the Brown and Lowe hierarchical classificaion of communities (Appendix D).

For each CA, current acreage represented in wilderness and RNA's is listed in Appendix B. These values include total acreage of roadless areas included in the Arizona Wilderness Bill, and are thus maximum estimates. The following habitat types are poorly represented in protected areas:

62

CA	Brown & Lowe Classification	Acres in Wilderness	Acres in RNA	Recommended Increase in Acreage
10R	224.520	480	---	1000
3P	142.100	67	---	1500
4M	141.400	62	---	500
6PS	123.311	987	---	1000
8M	122.314	183	---	100
9DHM	121.312	---	---	1000
?	123.521#	---	---	?

#Roughbark Arizona cypress forest (Redfield Canyon, Bear Canyon (Santa Catalina Mts.), Sabino Canyon)

In addition, adequate representation of CA 11BR is dependent on the final outcome of the Arizona Wilderness Bill.

For each of these above-listed CA's, identification of suitable sites for wilderness, RNA, or ZBA designation is a priority.

In contrast to wilderness, RNA's may be afforded the additional protection of a 'non-recreational' designation. Consequently, as genetic reservoirs for future needs and as study sites to help better manage public lands, RNA's represent an indispensible resource. FORPLAN printouts indicate that only 6 of the 27 CA's, representing just 4 of the communities identified by Brown and Lowe, are protected in RNA's. An immediate priority must be to identify and designate sites as RNA's which will include all Forest habitat types.

3. Evaluate the impact of multiple uses of Forest lands on wildlife, and manage this multiple use to optimize wildlife, watershed, and recreational values. In particular for wildlife:

63 a. Eliminate overgrazing (align use with capacity) before the end of the second 10-year period. The Coronado National Forest has the greatest AUM/acre of any National Forest (S. Johnson, Forest Planning 4(4): 14). The reduction of habitat quality through overgrazing is particularly harmful to wildlife.

64 b. Eliminate herbicide use as a means of range management.

65 c. Improve monitoring of fuelwood harvesting. It is unwise to use a single standard for fuelwood harvest for the entire Forest. Of particular importance, guidelines must be developed for cutting in oak woodland habitats characteristic of dry riparian areas (7B prescription). These habitats are often transitional in nature, and extensive fuelwood harvest can result in changes in community type. Development of guidelines for managing these 7B areas requires site by site evaluation and follow-up studies of harvested areas. The following practices, initiated prior to cutting and continued afterwards, will aid this evaluation process: a) compilation of

65 species inventories; b) description of soil type and site potential; c) maintenance of photographic records. In addition, review of old cut records, and comparison with current condition of these sites, is also recommended.

4. Protect all riparian areas (7A and 7B prescription). Riparian areas are extremely limited in the Coronado National Forest. They are important for watershed and recreational purposes as well as being critical wildlife habitats. Cattle must be excluded from all perennial streams. Management of other riparian areas (CA 10R, 11AR, 11BR, 12R) should also seek to limit use by cattle, particularly during the vegetation growing season of March-September.

5. Protect state-listed threatened and rare species, discourage introduction of non-native species, and revitalize populations of native species which have diminished as a result of human interference.

Threatened and rare species, along with their habitats, must be protected. Introduction of non-native species should be avoided, and discouraged though information and education of those people using the forest.

66 We also encourage the re-introduction and revitalization of native species whose populations have diminished. Included among these species are the Forest's natural predators--the coyote, foxes, and the cats--whose presence is vital to maintaining a natural community balance and to regulating herbivore (e.g. jackrabbit) populations. Other species

66 deserving consideration for re-introduction and having suitable habitat within the Forest are: a) the Tarahumara Frog, previously found in Sycamore Canyon, and demised for as yet unresolved reasons; b) the Masked Bobwhite, whose re-introduction is currently being pursued through appropriated Land and Water Conservation funds; c) the black-tailed prairie dog. Suitable lands within the National Forest should be protected to provide habitat for these species.

67 **6. Monitor ecosystem health through the improved use of indicator species, and through models based on vegetation structure.**

The indicator species concept is a useful one for monitoring the health of the different habitat types within the Forest. However, these indicator species need not be, and in most cases should not be, threatened or rare species occupying only limited ranges, or game species.

68 **We recommend the development of an indicator species list based upon habitat-type representation.** Indicator species that reflect the habitat types represented in the forest should be chosen, and it should be specified just what each indicator species indicates. Optimum population levels should be identified for indicatior species, and habitat should be managed with the aim of achieving these healthy levels. Indicator species should be monitored annually, particularly for threatened species and for populations occuring in the vicinity of vegetation manipulations.

We recognize, however, that animal population trends and absolute numbers tend to be imprecise, and in some cases are subject to fairly wide natural fluctuations. Therefore, a second monitoring system is recommended as a complement to the indicator species program. This approach is to create habitat models based on vegetative structure of healthy natural communities. Existing habitats would be assessed against these optimum communities. Vegetative structure could be monitored at less frequent intervals (five to 10 years) than the indicator species populations. This approach to monitoring is appropriate to the Coronado Forest because of the long-term impact of activities such as grazing, off-road vehicles, and mining on vegetation.

The following sources of public comment were used in compiling this "Citizen's Alternative". They were taken from public comment files for the 1982 Draft Coronado Plan.

AG-0031-85023
AG-0027-85715
AG-0016-94102
AG-0009-87102
OG-0009-20005
OG-0031-85716
OG-0022-85732
OG-0029-10022
OG-0030-00000

Watershed Proposal

Goals

69 1) Define existing and long-term watershed-specific soil loss levels for the Coronado National Forest.

70 2) Improve the quality of all watersheds on the Forest; bring all unsatisfactory watersheds up to satisfactory condition and bring all satisfactory watersheds up to 90% of optimum condition.

71 3) Improve the water quality of all surface water to full-body-contact standards (as defined in the 1972 Federal Clean Water Act Amendments).

72 4) Implement a nondegradation policy for all watersheds on the Forest.

Constraints

73 1) Money which is budgeted for watershed improvements should be applied to projects which improve the ecological health of the watershed rather than those which exclusively serve the needs of any single watershed use.

2) Projects which benefit one watershed (or one area within a watershed) or one resource at the expense of another area or resource should not be considered as a watershed improvement.

74 3) Soil loss levels should be minimized.

Miscellaneous Recommendations (including explanations of goals and constraints)

To promote consistent and ecologically-sensitive management on the Coronado National Forest, the definitions and assumptions which apply to three components of watershed management in the *Plan* should be clarified: soil erosion, watershed condition, and watershed improvement.

1) Soil Erosion

Because current watershed management practices on the Coronado National Forest are based on a measure of "acceptable" soil loss, an explanation of the Unified Soil Loss Equation as adapted to arid land ecosystems should be included in the *Plan*. Any numerical expression of soil loss on the Forest should be accompanied by an interpretation regarding why that level is deemed acceptable or unacceptable; if compared to other non-arid ecosystems, the numbers should be interpolated. Management practices which contribute to or decrease the level of soil loss in an area on the Forest should be discussed and justified in the context of the Watershed Element of the Plan.

75 Soil loss affects water quality as well as soil fertility; the

75 Pima Association of Governments 20B Water Quality Plan identified sedimentation as the primary water pollutant from non-urban lands in Pima County. Therefore, impacts on surface and ground water quality should also be addressed in the definition of an "acceptable" soil loss level.

2) Watershed Condition

76 Watershed management forms the basis for all resource management on the Coronado National Forest since it encompasses all resources and impacts all resource uses. In an arid enviornment, water is the critical resource and the impacts of any resource decision on water quantity and quality should be explicity analyzed and justified in the planning process. Watershed condition, therefore, wo uld be more accurately reflected if water as a whole system were considered.

An integrated definition of watershed condition would reflect water quality as well as water quantity, species of plants as well as basal area of plant cover, subsurface recharge as well as surface runoff, and riparian areas as well as hillsides. Such a definition would not necessarily require additional data collection, but would require that currently available data (i.e. precipitation patterns, vegetation, slope, exposure, etc.) be analyzed in new ways. Some budget shuffling might be justified if watershed management were to provide a basis for all resource decisions.

Current definitions of "satisfactory" watershed condition are based on minimum acceptable vegetative condition (i.e. plant basal area, or cover). The standard for watershed "health" would be clarified if watersheds were measured in reference to their specific optimum ecological potential rather than to the more subjective measure of acceptability. By measuring the existing vegetation against the potential rather than against a minimally acceptable level, the viability of the resource is measured rather than the impact of the resource use (i.e. the Forest Service as land resource manager rather than resource use manager).

3) Watershed Improvement

77 To clarify the definition of watershed improvement, the Coronado [illegible] should adopt a Forest-wide policy of "nondegradation" of watersheds. Under current practice, a new "management plan" for a grazing allotment which disperses cattle over a larger area than was previously grazed without actually reducing the number of cattle on the ground constitutes a "watershed improvement." There is a fallacy here; while the severity of impact in one area (or one watershed) may be reduced, the overall impact (i.e. the amount of vegetation Forest-wide removed by the cattle) remains the same. Therefore, the new "plan" does not consittute an "improvement", but merely a redefinition (of the status quo).

In measuring acres of watershed improvement, therefore, the impacts of a management action should be analyzed and justified at the Forest-Level as well as at the watershed - or allotment - Level. A nondegradation policy would provide a benchmark for measuring all plans against.

FUELWOOD

GOALS:

1) **Manage fuelwood harvesting on a sustained yield basis.**

2) **Fuelwood harvesting** should not impact **wildlife diversity and population levels, and should have** no **negative impacts to threatened and endangered species.**

78 3) **Fuelwood harvesting must not negatively impact watershed values or increase soil erosion.**

4) **The Forest Service should recover 100% of their expenses from permit fees.**

5) Eliminate fuelwood harvesting in riparian areas to protect wildlife and recreation values.

CONSTRAINTS:

1) Sustained yield must be maintained.

2) Only fuelwood for which the value exceeds the harvesting costs should be harvested.

79 3) **Fuelwood harvesting should occur only where it can be adequately monitored.**

4) Demand far exceeds supply on a sustained yield rotation.

5) Sustained yield can be maintained on an approximately 100 year cutting rotation in the majority of the Coronado N.F. cutting areas.

MISCELLANEOUS RECOMMENDATIONS:

80 1) Reduce cutting in the arid riparian zones because they are very important for wildlife.

2) Reduce the current thinning philosophy of cutting. Cut some small clear areas interspersed with clusters of trees. This is more advantageous to wildlife.

81 3) Current cut rotation cycle planning is 40 years in the oak-juniper-mesquite zone. Similar, but wetter zones in California plan 80 years. Since Arizona is more arid, 100 years would be a more realistic cycle.

4) Fuelwood harvest access must be carefully managed to minimize soil erosion and watershed damage.

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1. The Coronado National Forest appreciates the interest shown by the Sierra Club and others in management of the public lands. We, too, look forward to implementation, monitoring, and evaluation of this Forest Plan. We hope all interested segments of the public will continue to assist us.

2. All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

   To our knowledge all stated goals and objectives were met in the development of Alternative D. These are summarized on pages 21 and 22, DEIS.

3. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The comment period will be at least ninety days as it was for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

4. The Forest Plan does not propose any livestock grazing on rangelands previously determined to be unsuitable or unavailable for this use. Compared to the current situation (Alternative A), the intensity of range management will be less overall as inefficient rangelands are managed at lower levels of intensity and use.

   Vegetative management projects on the Coronado National Forest normally meet several resource objectives although most projects are financed by a single source of funds such as those for range betterment or for wildlife habitat improvement. Total vegetative management practices for the Coronado National Forest are estimated to directly affect 2998 acres per year or less than one percent of the total Forest acreage. See Table 15, Final Forest Plan. These practices include everything from planting riparian areas to fuelwood harvest to enhancing forage and browse production and sustaining plant diversity.

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Of this total acreage, approximately 400 acres per year would be financed from range betterment funds (Table 12, Final Forest Plan). These projects slow or reverse invasions of grasslands by woody species. They enhance forage and browse production for both livestock and wildlife and help sustain vegetative diversity. The same is true of the vegetative management projects financed by wildlife funds (Table 13, Final Forest Plan).

5. We agree there has been consistent written support for wilderness designation of the three Wilderness Study Areas. The public "will" is only one consideration used in making our recommendations for wilderness or nonwilderness management.

Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas.

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The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA.

6. Recommendations expressed in your Citizens' Management Alternative (Alternative D) have been added as part of your official comments. Responses have been provided to those items you indicated. The recommendations and comments relative to Alternative D were related to the 1982 Draft Plan and EIS. Our responses are relative to the 1985 Draft Forest Plan.

7. A stated goal of the Forest Plan is to "balance permitted grazing use with grazing capacity". Since the Plan is for a ten to fifteen year period, it is implied this balance will occur during this period. We estimate this will take place in the second period or ten to twenty years from initial implementation. The Forest is already working towards this goal, so we have high expectations of achieving this balance during the initial Plan period.

A related goal of the Forest Plan is to "produce livestock products consistent with other resources and uses". The goal does not carry a set level of use or capacity. We estimate that permitted use will decline to 350,000 AUMs during the first period and reach 338,000 AUMs during the second period. At the same time, capacity is estimated to increase as a result of better managed grazing allotments. This clearly shows the Forest believes that both reductions in numbers coupled with better management is necessary to achieve the overall balanced conditions.

Ultimate use and capacity levels and the time frames for achieving a balance of the two are estimates. These predictions may vary and only implementation and monitoring of the prescribed management practices will determine the estimates' accuracy.

The goals are the most important aspects of the Forest Plan. The Plan was developed under law and regulation and with strong public involvement. Goal revisions would require following the same process and is not something to be done by a "stroke of the pen". We feel the goals as stated in the Forest Plan do represent a commitment to the public by the Agency.

8. We agree some portions of the range monitoring section appear weak and inadequate. The term FREQUENCY refers to measuring and compiling information related to the item being monitored. The terminology TIME FOR REPORTING refers to the periods at which the Forest will evaluate the data and report the results and recommendations to management. Wording in the introduction to the Monitoring Section has been changed to clarify this in the Final Forest Plan.

For all range items to be monitored, the frequency of monitoring or gathering of data is shown as annual. We feel this is still appropriate. For some items, the length of time for evaluating and reporting results is too long. This would not enable us to effectively track results of balancing livestock use with capacity and achieving satisfactory allotment management plans. In these instances, the reporting time has been changed to annual. See Range Items 2, 3, 5, and 6. In addition, the deviation that would trigger an in depth evaluation has been lowered for Range Items 3 and 6. These changes appear in the Final Forest Plan.

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9. Please see response number 7 for a discussion of commitment to goals and objectives and adjustment of Plans.

We agree and have acknowledged that portions of the Coronado National Forest have been overgrazed since the early 1900's when the National Forest was established. We do not agree that improvements in this situation have been slow and ineffective for lands administered by the Coronado N.F. Given the numbers of livestock and condition of the land in Southern Arizona at the turn of the century, improvements in range management on the Coronado must have been effective, otherwise 84 percent of the rangeland would not presently be in satisfactory or better condition. This rate of improvement has been accelerated in recent years because of increased commitment by the ranchers in response to several factors, including economics and public concern. We see no reason for this commitment by the livestock industry or the Agency to decrease.

10. Predictions of livestock use and capacity made in the 1982 DEIS and Draft Plan were based on much more conservative estimates of the status of forage capacity in relation to overall trends. In addition, political "realities" were given more weight in estimating our ability to make adjustments in numbers or to get satisfactory management plans in effect. This in turn affected our estimates of capacity recovery. In other words, these predictions made in 1980 and 1981 were somewhat pessimistic relative to the productive capacity of the land given proper management.

In the three years from 1981 to 1984 the Forest made management adjustments in 35 of the 76 range allotments deemed to be under unsatisfactory management. This significant progress was the major reason for revisions in our ability to directly affect forage capacity recovery and necessary reductions of livestock numbers. These revised estimates led directly to the shorter time frames for balancing use and capacity depending on the level of range management chosen.

We agree that the important issue is to end overgrazing. This is the goal and commitment of the Forest Plan. As stated previously, the ultimate levels of use and capacity are estimates and depend on the condition of the land and resources.

11. You are correct that capacity and use estimates for 1981 indicated a 20 percent overstocking rate. All alternatives considered in detail were designed to correct this situation. Management direction as in the proposed Forest Plan is estimated to reduce this rate to only five percent by the middle of the first decade and eliminate the situation entirely by the middle of the second decade. Range management includes better distribution and movement of livestock within a given allotment. Simply reducing numbers of livestock does not alleviate poor land conditions because the cattle will still concentrate in the "easy" areas which are usually the problem areas. While better management will lead to improvements in land condition and capacity, it does not automatically lead to more numbers. The land must have the inherent capacity to support the various resource uses.

12. As a matter or principle, we do not believe that it is appropriate to single out Forest Service range permittees as being the sole recipients of a federal "subsidy." Practically speaking, a subsidy exists whenever an individual receives benefits in excess of the fees paid by that individual to enjoy those benefits. Another way of expressing this would be to view it as an income of wealth transfer. This kind of income redistribution does not necessarily involve the actual transfer of cash. For example, in the case of a recreation user who pays no fees or only a nominal fee to use the National Forest, the user is receiving a considerable benefit without having to pay the full actual cost of providing that benefit. Since the source of the Forest Service recreation management funds is the public treasury, it could be said that all recreation users on the National Forest are being subsidized. Viewed from this perspective, almost all of the use and enjoyment derived from the Coronado National Forest could be considered to be a subsidy. This kind of subsidy would include virtually

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all developed recreation use, dispersed recreation use, skiers, bird watchers, wilderness users, hunters and fishermen, all downstream water users who benefit from watershed management, private property owners who benefit from Forest Service fire protection programs, range permittees, firewood users, anyone who uses a Forest Service road, etc. The potential list of Forest users who could be considered to be the recipients of a subsidy or income transfer is practically endless. Under the existing rules of our society, the public sector provides many such subsidies which touch the lives of all citizens. The ultimate decision of who receives a subsidy and who pays rests with the elected representatives of the people, in other words it is a political decision. The U.S. Forest Service, as custodian of public trust lands, operates under authorities granted by the U.S. Congress and is not empowered with the authority to make the ultimate decision of who is subsidized and who pays. In summary, the subsidy issue which you raise is indeed a critical issue. However, it should be remembered that range permittees are but one among many National Forest users who receive benefits in excess of costs necessary to produce and distribute those benefits.

13. The intent of the proposed Forest Plan is to manage livestock in areas where it is most cost effective. This is one reason for the predicted 25 to 30 percent decrease in rangelands that would be managed at Level D. It is our belief that some lands can be more effectively managed with lower numbers and less management intensity. This in turn will probably lead to a reduced distribution of livestock overall, as portions of allotments are used less or not at all. A good example is the Redfield Allotment (Galiuro Mountains) where livestock grazing has been determined to be uneconomical and inefficient under present conditions.

Livestock use is always computed below actual forage capacity. At most, only 35 to 55 percent of the actual forage is allocated to use by cattle and wildlife. The other is available to retain the health and vigor of the plants. The percentage of use varies by area and season depending on total resource needs.

14. You are correct in that the alternatives displayed in detail do not have a wide range of livestock use estimates. This is based on our belief that moderate levels of well-managed livestock grazing can coexist with increased emphasis on other resource opportunities. For example, Alternatives B and C provide for substantial increases in different types of recreation opportunities, including wildlife opportunities, while also providing for moderate levels of grazing. Even the benchmark alternatives developed to maximize single resources such as recreation and wildlife indicate that moderate levels of grazing would be compatible with those uses.

Some benchmark alternatives, such as Low Intensity, did address lower levels of livestock grazing but were not displayed in detail for other reasons.

The proposed Forest Plan and all alternatives seek to generate various mixes of resource uses within all constraints, including financial constraints.

15. Based on page 110 of the DEIS, the proposed Forest Plan and all alternatives will result in a satisfactory or better watershed condition by period 5. This estimate of results and the goal of achieving satisfactory or better watershed conditions does not mean improved conditions will not take place prior to year 2030. The Plan gives priority for improvement projects to those lands in unsatisfactory condition.

Many management actions will lead to improved watershed conditions. The elimination of overgrazing is only one action taken to help improve the watershed conditions. It is a significant action, however, the single action of removing livestock will not result in immediate improvement of watershed conditions. It must be coupled with improvements in vegetative cover.

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Please take note that forage capacity estimates keep increasing for all decades. This is the result of improved vegetative conditions and not the result of allocating higher percentages of vegetation to livestock use.

Much of the Coronado National Forest lies in a semi-arid climatic regime and changes take place slowly. Therefore, the end of overgrazing (balance of use and capacity) at twenty years or less is not the same as having all rangelands or watersheds in satisfactory or better condition. Improvements in land conditions are taking place now and will continue to occur with each positive management action. Additional direct watershed improvement projects could be implemented but these are costly and only applicable to small areas as shown on page 109, DEIS. Indirect actions with a management emphasis on those areas in less than satisfactory condition is the most effective way to improve land conditions.

16. Although our predictions for improved rangeland conditions by Period 5 may appear unacceptable, there is a reason for not showing a 100 percent improvement rate. The estimates are consistent with our commitment to end overgrazing and improve the condition of rangelands, watersheds, and riparian areas. Standards to indicate satisfactory conditions for each of these are somewhat different, although they are related as all improvements help to produce stable and productive ecosystems.

In the case of Management Area 4, we have reviewed and revised downward our estimate of unsatisfactory range condition by Period 5. Approximately five percent of the total acres are shown in unsatisfactory range condition. This is because some of the areas managed at Level B will not improve to a fair range condition due to a lack of direct range improvements. This improvement would not be cost effective. The acres represent areas that will actually be closed to livestock grazing as a part of reducing numbers during the first two periods. The areas will eventually recover naturally but their range condition will not be satisfactory to support grazing.

In Management Area 7A (riparian areas), the acres shown in unsatisfactory range condition represent riparian areas that can not support livestock and have been or will be permanently closed to grazing. The standards for satisfactory riparian conditions do not necessarily result in a satisfactory range condition. Other riparian areas may be closed to grazing permanently or temporarily for other reasons.

We have reviewed the predicted range conditions for Management Area 7B (higher ecosystem extensions). The ten percent of the area shown in unsatisfactory range condition are those acres that can not support livestock forage and have been or will be permanently closed to grazing as part of balancing livestock use with capacity. Other areas may be closed permanently or temporarily closed to grazing for other reasons.

Range conditions are measured on the lands' ability to produce forage suitable for livestock use. We have attempted to relate range condition to ecosystem condition by defining a fair range condition (50 to 75 percent of potential forage production) as a moderately high ecological condition. Upon review of this definition, we now find that a moderately high ecological condition should be closer to 70 to 75% of potential production. The range goal in the Forest Plan has been revised to reflect this change.

Although satisfactory range condition results in satisfactory watershed condition, the opposite is not always true. Some watersheds in satisfactory hydrologic condition may not be capable of producing forage species suitable for livestock use. Satisfactory riparian conditions do not necessarily result in satisfactory range conditions because of the plant species mix. The opposite is also true. A riparian area covered with grass plants and few woody species may make excellent range condition but it is not satisfactory as a riparian ecosystem. In summary, the improvement of total ecosystems must be measured by the satisfactory condition of all the components and not just one.

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17. Although the riparian area in Guadalupe Canyon has been adversely impacted by past livestock use, studies are currently underway to determine the condition and potential stocking rate of the Guadalupe Allotment. A combination of stocking and management are planned in the next couple of years to improve riparian conditions and emphasize wildlife values and to provide for the continued public enjoyment of these values.

18. See response number 8 for a discussion of monitoring.

19. While it might be nice to have all capability areas (CAs) represented in wilderness areas of the Coronado National Forest, this may not be possible or practical. Many of the CAs you list occur on slopes less than fifteen percent by definition of the CAs as found on pages 110 through 112 Draft Plan. Because of the gentle slopes and high productive resource capability of these areas, they are already roaded and developed in some way. They did not meet the wilderness criteria. Portions of the specific canyons you mention (Redfield, Sabino, etc.) for habitat of Roughbark Arizona cypress forest are within designated wilderness areas. The likelihood this forest type is well-represented in wilderness on the Coronado N.F. is good.

Keep in mind the CA types you mention are part of larger ecosystems that are represented in wilderness areas on the Coronado N.F. or elsewhere.

20. The capability areas - 4M (mountain meadows) and 9DHM (spruce-fir forest) - do not occur within the Mt. Graham Wilderness Study Area. Portions do occur within the larger identified roadless area which is being considered for wilderness designation as part of the Mt. Graham Astrophysical Area EIS.

21. We agree that identification and designation of appropriate RNAs is important and believe the Coronado N.F. can be justifiably proud of leading the Southwestern Region in that effort. We have more RNAs than any other Forest and with our proposed additions, will have represented all targeted types on this Forest.

Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually precludes or severely restricts most resource uses, including recreational activities.

We have carefully reviewed all proposed Research Natural Areas and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out each special area. We recognize that the entire National Forest is a unique place and worthy of special care.

It is important to bear in mind that the RNA program is national in scope and not limited to National Forest lands. It is not necessary or even desirable to have every vegetative type within the Coronado N.F. represented by RNAs on this Forest. Better representatives may well exist elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

Zoological and/or botanical areas have been proposed for areas where truly unique biological resources are in need of special management emphasis to accommodate public use and enjoyment of them. Most of the Coronado is biologically unique and our overall management emphasis is aimed at preservation of these qualities of the land. The ZBA designation has been reserved for those special areas where more than ordinary management emphasis is required. Such areas are identified in the Plan, and others were considered as suggested by various respondents.

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The question of the need to designate the Mt. Graham wet meadows as research natural areas will be addressed again in the Mt. Graham Astrophysical Area EIS.

22. We certainly agree that riparian areas need special management considerations, because they are sensitive to grazing and other land uses. This is one reason for delineating these as a separate management area (MA 7). Two types of areas have been identified--true (wet) riparian areas and (dry) higher ecosystem extensions such as oak or mesquite bottoms. Management prescription 7A applies to the riparian areas and prescription 7B applies to the higher ecosytem extensions. These types of areas also occur in other Management Areas such as wilderness (MA 9) and zoological/botanical areas (MA 14) and are protected by virtue of the special area prescriptions.

The vegetation component standards for riparian areas is given on page 45 of the Draft Plan. We have revised the wildlife and plant diversity guideline for all fuelwood harvest areas (including 7B) to say "Retain 20 percent or more of the stand in mature or overmature age classes as an old growth component. The 20 percent is intended as a minimum and can be increased to meet needs of specific wildlife species as you suggest. We have reviewed the definition and guidelines for old growth used by the Northern Arizona Forests. They define old growth as "A stand of timber (or woodland species) that is past full maturity and well into old age. The last stage in forest succession". We have included this definition in our wildlife and plant diversity standards and guidelines. We question if the minimum standards used by Northern Forests for ages, number of trees, and tree sizes is appropriate for Southern Arizona woodlands. For example, a minimum diameter of nine inches may be okay for pinyon-juniper on the Coconino, but may be too small for the oak woodland on the Coronado. We welcome your help and that of others to determine appropriate standards for the old growth component on the Coronado.

We agree that some areas should be off limits to fuelwood harvest or any other activity that is detrimental to a critical resource. This direction is provided for in all Management prescriptions, especially 7A and 7B, and is routinely practiced on a case by case basis. If you have suggestions for criteria to delineate these critical areas, we would like to see them.

Because of the linear nature of these areas, it would be very expensive to fence each one. The Forest Plan would attempt to solve grazing related riparian problems first through range management practices, and where that fails, through exclusion of livestock. We recognize that some riparian areas are too sensitive to tolerate any grazing. Criteria to help identify these extra sensitive areas have been added to the Forest Plan in range management standards and guidelines for Management Area 7.

The Forest Plan provides for monitoring and evaluation of riparian ecosystems.

23. Although the Forest Plan suggests methods to monitor responses of wildlife populations and habitat, the primary purpose is to identify species and activities to be monitored and the points at which management direction needs to be evaluated and changed if necessary. Monitoring methods listed are those currently available to us. As new methodology is developed, including habitat or species models, we plan to adopt any that meet the needs and are efficient. These models represent only one part of the total monitoring job. They are used to simulate or evaluate changes based on data gathered in the field.

Early in the Coronado N.F. planning process all interested wildlife managers were invited to participate in the selection of indicator species. Participants in this process included representatives of Arizona Game and Fish, U.S. Fish and Wildlife Service, the University of Arizona, Tucson Audubon Society, the Nature Conservancy, and Forest Service Wildlife Biologists. They agreed on a list that seemed appropriate at the time.

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The list of management indicator species will be reviewed and updated concurrent with the wildlife monitoring and evaluation. For many species, habitat and population data was limited.

Some attempt was made to define minimum viable populations for management indicator species in terms of defining currently occupied habitat. For many species, habitat and population data was limited or nonexistent. The assumption was the current occupied habitat was the minimum desirable situation for populations. This assumption of minimum habitat allows for needed habitat and population increases. The habitat acres are displayed in the DEIS, pages 74 and 75, and the Draft Forest Plan, page 141 (Appendix J).

The Forest Plan does contain a commitment to refine the wildlife monitoring methods. See page 94, Item 8 EVALUATION, Draft Plan.

24. We also support monitoring of vegetation changes and believe this concept can be coupled with the monitoring of wildlife habitat. We plan to work with interested and appropriate parties to refine the monitoring portion of the Forest Plan.

25. Page 108 of the DEIS states "Surface flow usually sinks into the intermittent stream channels where it recharges the groundwater basins." Therefore, it is obvious that most Southern Arizona residents are highly dependent upon runoff yield. Page 108 also states: "No alternative significantly affects the Coronado's contribution to the ground water resource." This statement is true because no alternative would increase or decrease the annual yield of water. In addition, all alternatives will result in satisfactory of better watershed conditions (page 110), thereby retaining the hydrologic function related to recharge of groundwater as well as retaining the basic soil productivity. All alternatives will eliminate overgrazing by the second period and provide improvement of rangeland conditions as one set of management actions to improve watershed condition. Others are also proposed and vary by alternative.

The proposed Forest Plan does not emphasize the use of herbicides and pesticides. It only lists certain chemicals (see page 51, Draft Plan) as part of the tools for managing the Forest. The same tools would be applicable to other alternatives. The actual use is expected to be very limited. The projected use of pesticides does not threaten groundwater quality because all use will be within manufacturer's and EPA guidelines designed to protect groundwater as well as surface water.

For these reasons we disagree the Proposed Action or any alternative fails to adequately address the watershed condition issue and in particular the question of groundwater recharge.

26. The Coronado N.F. has no control of lands in the basins where the vast majority of groundwater recharge occurs, hence our task is to deliver high quality water in a useable flow regime to the Forest Boundary. Large increases in water yield are usually accompanied by large increases in sediment, which has the potential of sealing channel surfaces and reducing recharge through those channels. It is to the advantage of both the Forest and off-Forest users to first seek improved water quality and flow regime characteristics (fewer periods of flood and no-flow) through watershed improvement rather than seeking to set and meet groundwater recharge targets. These targets would be difficult to measure if not impossible to implement given current land ownerships.

We agree that watershed condition and groundwater recharge are important to community stability. This is the reason the proposed Forest Plan and all alternatives provide for improvements in watershed condition.

27. The benefit value used for water yield is taken from the 1985 National RPA analysis. All benefit values are established based on the common assumption that use is on-site, without further processing. For example, an AUM

is valued as an animal on the Forest, not on the basis of the price of hamburger or steak in the supermarket. Timber is not valued on the basis of the cost of milled lumber. As you can see, both grazing and timber would have much larger values if the benefit values were based on the prices charged in Tucson stores. The same is true for water. The cost of delivered water in Tucson includes the costs of collection, storage, and delivery. We believe the relatively low value for water we used is appropriate for forest planning.

The market value used for water is for total water yield. None of the alternatives affect water yield. Therefore, water yield benefits are the same for each alternative regardless of the benefit value used per acre foot. The water yield benefits have no effect in the planning model (FORPLAN) on the selection of management prescriptions or alternatives. The effects upon resources because of past livestock grazing problems are reflected in the resource yield predictions used in the planning model. In addition, a negative benefit was assigned to soil loss which is a reflection of watershed condition. This negative benefit has an insignificant effect on total benefits because all alternatives would resolve any overgrazing within 20 years and provide significant improvements in watershed conditions within 50 years or less.

28. We disagree that water yield can be more than doubled from the present average of 146,000 acre feet.

For the reasons cited on pages 221 and 222, DEIS, most vegetation types were not considered for water yield improvement activities because of low potential increases. For the four vegetation types capable of producing a reasonable increase (greater than 0.50 inches per year), the total additional yield would be 7625 acre-feet per year, an increase of five percent. This is at a cost of converting all of the Forest's ponderosa pine, mixed conifer, and spruce-fir vegetation types to grasslands.

29. We agree that any allotment which is stocked in excess of capacity under current management is less than satisfactory. When "unsatisfactory allotments" were defined the assumption was made that 20 percent overstocking could be solved by management changes, without significant reductions in numbers of livestock.

30. Based on responses 25 through 28, we disagree that the proposed Forest Plan does not address groundwater recharge and does not accurately value soil and watershed benefits. We also disagree there is planned overgrazing in any alternative. There is no basis to contend that the limited use of herbicides and pesticides threaten groundwater quality.

We do agree that Forest management should minimize soil erosion and maximize groundwater recharge in terms of quantity and quality. This is exactly what the proposed Forest Plan and alternatives will do.

31. Fuelwood harvest is an activity used to meet other resource objectives such as providing wildlife habitat needs and recreation opportunities. In order to manage the stands to meet these objectives, adequate access is needed. These access roads often provide other recreation opportunities for the public. New road construction is projected to be minimal and will be only ten miles during the Plan period. Your assessment of detrimental effects to wildlife, watershed and recreation values is not supported by environmental effects displayed in the DEIS.

The predicted harvest level is the result of applying the standards and guidelines for fuelwood harvest in the proposed Plan. We agree that nature does eventually provide for diversity if things are left entirely alone. However, nature's way of providing diversity is often slow and devastating, especially where man has already had an influence upon the natural diversity. The choice is one of waiting for and accepting the risks inherent with nature or creating the desired diversity through planned management actions. Practices such as fuelwood harvest not only create diversity but utilize an available resource for man's benefit.

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This activity would affect approximately 6250 acres or less than one percent of the Forest within the Plan period (10 years).

32. We disagree that fuelwood harvesting criteria are not well defined in the Plan. Various standards and guidelines are included to insure the fuelwood harvest activity maintains or enhances requirements for all resource needs. This activity will not negatively impact watershed, or wildlife values given the prescribed standards and guidelines. Harvest in riparian areas is minimal. Some roads are needed to access and manage the stands as discussed above. The fuelwood stands are managed on a sustained yield basis as indicated in Table 7, Draft Plan. Fees for fuelwood are constantly reviewed and revised based on local product prices and costs to harvest.

33. We agree there should be greater emphasis on recreational opportunities. The Forest Plan recognizes recreational values and uses, but also recognizes future financial constraints on management of all the resources and protection of the basic environment to ensure future resource opportunities. Approximately 19 percent of the total annual Forest budget goes to managing the recreation resources. While this financial emphasis may not be as much as we would like, the other resource uses must receive adequate management to ensure they do not impact the recreation resource. The Forest Plan places an emphasis on maintenance and management of existing recreational facilities before construction of new facilities. A number of new sites are shown as desirable and needed over the next 50 years, in the event funding becomes available.

Better trail access is one of our priorities. We are currently working with Pima County and private landowners to provide needed access to trails in the Santa Catalina Mountains.

Access to the trailhead for the Ventana Canyon Trail has been provided by the private landowners in their parking facilities. Negotiations are underway to develop a separate public parking facility. Access to the Pima Canyon Trail is via the Magee Road Trailhead Parking. Negotiations are also underway to secure a more suitable trailhead parking facility. A public parking facility is available on Linda Vista for access to National Forest land on the west end of Pusch Ridge.

The proposed Forest Plan gives additional emphasis to trail maintenance. Because of anticipated funding shortages, the Coronado Forest is relying heavily on the use of volunteers to get the needed maintenance done. Intent of the Forest Plan is to maintain most trails to a standard that provides for public safety and minimum user convenience. This standard will accommodate users with an intermediate experience level. Others will be maintained at higher or lower standards depending on the experience opportunity to be provided to the users.

34. The purpose of the planned policy for managing motor vehicles is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

The use of motorized vehicles is currently not permitted on trails within the Santa Catalina Ranger District. This policy will continue.

Any need for motor vehicle use restrictions on other trails of the Forest will be monitored as we begin implementation of the Forest Plan. Specific needs can be handled on a case by case basis.

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35. The Forest Plan recognizes the need to provide low impact recreation use in Madera Canyon and the South Fork of Cave Creek. This is one reason day use activities are being emphasized. Recreational facilities will be designed or redesigned to emphasize and accommodate these kinds of recreation opportunities.

36. We agree. The proposed Forest Plan provides this direction. See pages 40, 62, 63, and 84 of the Draft Plan.

37. The proposed Forest Plan will achieve a satisfactory condition on all watersheds by the fifth period (50 years). This does not imply that every acre of all watersheds are in satisfactory condition, but sufficient areas of each watershed will have adequate cover so that the hydrologic response and soil productivity will be optimized. Improved management practices are prescribed Forest-wide, therefore, watersheds already in a satisfactory condition should get better. The goal of the Forest Plan is to improve and maintain all watersheds at a satisfactory of higher level. Most watershed improvement will result from indirect effects such as balancing livestock use with capacity, improving management of range allotments, providing adequate maintenance of roads and limiting motor vehicle travel to roads and trails. Some direct watershed treatment projects will be used on specific areas to supplement improved management of other resource activities.

    Also see response number 15.

38. One goal of the Forest Plan is to balance livestock grazing capacity with use. Our estimates indicate this will be achieved during the second period after implementation, if not sooner. A related goal is to restore all rangeland to at least a moderately high ecological condition with stable soil and a static or upward trend. This is a minimum and we expect many ranges to achieve better results by the end of the fifth period (50 years).

    Also see response number 7.

39. The Forest Plan gives priority emphasis to improvement of rangeland, watershed, and riparian conditions. This is to insure that present and future resource opportunities are available. Livestock grazing is permitted in conjunction with other resources, such as recreation and wildlife habitat, and not at the expense of them.

40. Please see response numbers 19, 20, and 21.

41. See response numbers 7, 38, and 39.

42. See response number 22.

43. See response number 37.

44. The Forest Plan does not prescribe any rangeland to be managed at Level E. Approximately 50 percent of the total suitable rangelands, are prescribed to be managed at Level D. The rest would be managed at Levels B and C. The various levels of range management describe the intensity of management and do not necessarily imply a livestock use intensity. For example, the use level prescribed for management Level D is only 35 to 55 percent.

    Vegetative management to improve rangeland conditions is estimated at only 400 acres per year. Most of this would be done by prescribed burning or mechanical means. Herbicides are considered an alternative method where the other methods are not effective (See page 37, Draft Plan).

45. We agree and this is what is predicted by the Forest Plan.

46. The term range capacity or condition as used by the Forest Service is defined as "The state and health of the range based on what that range is naturally capable of producing." Condition is expressed as satisfactory or unsatisfactory. It is related to ecosystem or watershed condition but they are not one in the same.

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See response number 16 for a discussion of this relationship. The condition classes used--very poor, poor, fair, good and excellent--are based on the condition of the existing vegetation in terms of the kinds and amount being produced that are suitable for livestock. The existing conditions are influenced not only by the productive capability of the land but also by the quality of the range management activities practiced. Range management practices are used on the Coronado National Forest to improve rangeland conditions and ultimately ecosystem conditions. These practices include such activities as removing livestock, constructing fences and waters to improve distribution and controlling competing vegetation. The level of livestock grazing is the result of a land condition and not a goal itself.

The Forest Service has long been known within the range management profession for a very conservative approach to range management and livestock stocking rates. Our colleagues at the universities and in other agencies often accuse us of an overly conservative approach. An example of this is the Forest Service adjective range condition rating. Forest Service condition classes are generally one class lower than other organizations. For example, a range classified as "Fair" condition by the FS would be called "Good" by most range management organizations. This is not a real difference in opinion about the condition, but merely a difference in terminology. The Forest Service, therefore, defines an acceptable situation as: "Fair or better range conditions, with a stable soil and a stable or upward trend."

47. We agree that vegetation, soil, watershed, and wildlife resources should be the primary focus of management. We also believe these resources should be used to produce wood, forage for livestock, and recreation opportunities such as birdwatching and hunting. This orientation is consistent with the National Forest Management Act of 1976 and other Acts governing management of the National Forests.

We disagree the Coronado National Forest is or ever has been manipulating management objectives to fit a grazing system. Rather, grazing systems are changed to better sustain and improve the base resources which in turn permit uses such as livestock grazing.

48. The things you mention are considered in the assessment of rangeland resources. The analysis procedure is detailed in a Forest Service Handbook entitled Range Analysis and Management. The analysis takes into account all resource needs and not just livestock use.

49. We agree. See response numbers 4, 13, and 44 for details. We are informing and involving the Sierra Club and others regarding range management and improvement projects. We cannot agree to a blanket statement that environmental impact statements be prepared for all projects involving the use of herbicides in vegetation management. A site specific environmental analysis is always conducted. The herbicide issue is now being considered at the Forest Service Regional and National levels because of various court decisions.

50. The statement you refer to was in the 1982 Draft Plan, page 42. The statement was in reference to informing and educating the public about any management activities on the Coronado National Forest not completely understood. It had nothing to do specifically with the use of chemicals and certainly was not used in the context you suggest. The 1985 Draft Plan describes potential uses of chemicals on the Forest on pages 37, 51, and 128. We routinely conduct site specific environmental analysis for any projects involving use of chemicals. The degree of significance and controversy determine the level of public involvement needed.

51. See responses number 49 and 50.

52. See responses number 49 and 50. As has been stated previously, the use of chemicals on the Coronado National Forest is expected to be very minimal.

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The potential uses and conditions of use are prescribed in the Final Forest Plan as they were in the 1985 Draft Plan. When site specific projects are analyzed, the "No Action" alternative does mean no chemicals or no vegetation manipulation.

53. See responses 49, 50, and 52. Integrated pest management (IPM) is a well established procedure within the Forest Service, therefore, we see no need to list in the Plan all policies, etc. pertaining to this. A definition of IPM as found on page 179, Glossary, DEIS, is repeated here.

Integrated pest management - A process for selecting strategies to regulate forest pests in which all aspects of a pest-host system are studied and weighed. The information considered in selecting appropriate strategies includes the impact of the unregulated pest population on various resource values, alternative regulatory tactics and strategies, and benefit/cost estimates for these alternative strategies. Regulatory strategies are based on sound silvicultural practices and ecology of the pest-host system and consist of a combination of tactics such as timber stand improvement plus selective use of pesticides. A basic principle in the choice of strategy is that it be ecologically compatible or acceptable.

Table D-2, page 128, Draft Plan lists vegetative management practices by general categories--mechanical, chemical, prescribed fire and fuelwood sales. Specific methods were not listed because they are numerous as you have noted. Analysis of site specific projects will determine the most appropriate method. The intent of Table D-2 was to indicate practices known to be effective for certain land areas and vegetative species. A biological category was not included due to a lack of experience with them in Southwestern ecosystems.

54. The public involvement and decision making steps you propose are some of those commonly used in any environmental analysis and decision making process. The degree to which they are implemented depends on the significance and controversy of individual proposals.

55. The consideration of wildlife habitat does have a high priority in management of the Coronado National Forest. All resource management goals are aimed at achieving and sustaining healthy, natural plant and animal communities in order to provide multiple use opportunities for the future.

56. See response numbers 19, 20, and 21.

57. The Forest Plan recognizes the importance of recreation and wildlife opportunities for the Coronado N.F. Resource goals are aimed at improving and optimizing basic watershed resources within the concept of providing multiple opportunities.

The Forest Plan will eliminate overgrazing within the first two periods after implementation.

We can not agree that herbicides should be totally eliminated from consideration as a management tool. Our estimated use is very limited and only used where other methods are not effective or economically sound. See response numbers 50 and 52.

Monitoring guidelines for fuelwood harvest are found on pages 100 to 102, Draft Plan. In addition, increased emphasis will be given to administration of fuelwood sales and illegal wood harvest.

58. See response number 22.

59. The Forest Plan does provide for protection and enhancement of threatened and endangered species--federal and state listed. See wildlife goals on page 23, Draft Plan.

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We do not anticipate that a majority of resource objectives under the Forest Plan will require nonnative plants. We will always use native species over nonnative species if native species will accomplish resource objectives. On some sites which have been denuded by fire or overgrazing, our past experience has shown that native species will not survive and provide effective ground cover. In these cases nonnative, naturalized species such as orchard grass or Lehman's lovegrass are used to establish ground cover to prevent further erosion.

The responsibility for reintroduction of wildlife species rests with the State Game and Fish Departments, or sometimes, the U.S. Fish and Wildlife Service. When suitable habitats on National Forest land are available for reintroduction, we will work closely to encourage the involved agencies to provide the animals. The only species currently under consideration for stocking are desert bighorn sheep.

60. See response numbers 23 and 24.

61. See response number 55. Minimum desirable vegetative and wildlife habitat conditions are defined in Appendix J, page 141, Draft Plan. These need to be refined as part of monitoring and evaluation.

62. See response numbers 19, 20, and 21.

63. The goal of the Forest Plan is to eliminate overgrazing before the end of Period 2. It is not surprising the Coronado National Forest has the highest stocking per suitable rangeland acre. Much of the Coronado is grassland and open woodland which is more naturally productive in terms of herbaceous species than are dense woodlands and timber lands. In addition, the Forest has a longer grazing season due to the relatively low elevations and southern location. It is not due to the "planned" result of overstocking.

64. See response number 57.

65. The proposed Forest Plan does not prescribe a single standard for fuelwood harvest. Silvicultural standards are prescribed to fit woodland and coniferous forest species and fit the overall objectives of wood harvest--enhancement of recreation and wildlife values. Additional standards and guidelines are provided specifically to address wildlife and plant diversity needs. The standards and guidelines of the Forest Plan are applied as appropriate to individual sale locations and supplemented as needed through environmental analysis to satisfy site specific management concerns. The design of the standards and guidelines and harvest levels are based on inventories and past experience as you suggest. Future planned monitoring will enable us to better refine and apply appropriate standards and guidelines for wood harvest.

66. See response number 59.

67. See response numbers 23 and 24.

68. See response numbers 23 and 24. The Forest Plan prescribes annual monitoring for wildlife.

69. Soil loss levels have been calculated based on direction contained in Region 3 Terrestrial Ecosystem Note 2550-5, April 1981 and through use of the Universal Soil Loss Equation. These were calculated for all capability area types. Natural and current losses were calculated and future loss was estimated for various management prescriptions. See pages 222 to 226, DEIS.

70. See response number 37.

71. We agree that water quality for surface water should meet full-body-contact standards in areas of public use concentration. The Clean Water Act as amended prescribes other standards that are more appropriate and realistic for most areas of the Forest.

Agency response to Sierra Club, Grand Canyon Chapter (continued)

72. See response number 37.

73. All improvement projects on the Coronado National Forest are designed to maintain or improve watershed conditions. Limited amounts of improvement will be financed directly from watershed funds. These projects are designed for very localized situations, such as gully treatment. They are done in conjunction with other management improvement measures to bring about improvement in entire watersheds. This combination of limited specialized projects coupled with better management of all resource uses is the most efficient and effective way to improve and sustain good watershed conditions.

74. We agree soil loss levels should be minimized while providing a mix of resource opportunities for the public.

75. See response numbers 25 and 26.

76. Watershed condition is defined as the health of a watershed, or portion thereof, in terms of the factors which affect hydrologic function and soil productivity. Two condition classes are used to describe this health or condition--satisfactory or unsatisfactory.

As can be seen watershed condition is related to the quantity and quality flow of water from the land. Rangeland conditions are measures of the land's ability to produce and sustain herbaceous forage. Riparian condition is a measure of the health of that particular ecosystem. There are measures to indicate the condition of timber and woodland stands relative to wood fiber production. Other measures determine the health of specific habitats relative to wildlife species. There is no one simple measure to determine the condition of an entire ecosystem. All individual components have to be considered. Satisfactory or better conditions for each component are an indication of good conditions for entire ecosystems. This is the goal of the Forest Plan.

The primary role of the Forest Service is to manage the land and natural resources. In order to insure good land and resource conditions, the various uses must be managed.

77. See response number 37.

78. See response number 32.

79. See response number 57.

80. Guidelines for fuelwood harvest in riparian areas and higher ecosystem extensions are given in management prescriptions for 7A and 7B. The primary management emphasis for these two Management Areas is to perpetuate the unique wildlife and vegetative species. Harvest guidelines, including wildlife and plant diversity guidelines, are designed to accomplish this direction.

81. The cutting cycle of 40 to 50 years proposed in the Forest Plan is based on past experience with regrowth of oak species. A cutting cycle is the average time between entries into a particular stand of trees for some sort of harvest treatment. It does not represent the rotation age of the species being featured. We would agree that the rotation age for woodland species is 80 to 100 years or even longer. Since research is lacking for the oak woodland of Arizona, we have not identified a rotation age. A correlary to fuelwood management is the 20 year cutting cycle often used for ponderosa pine with a rotation age of 120 years.

0041

3201 No. 16th Street•Suite 6A
Phoenix, Arizona 85016
602•277•8079

SIERRA CLUB SOUTHWEST OFFICE

July 22, 1985

CORONADO N. F.
JUL 25 '85

Action X Info ✓ Init	Action X Info ✓ Init	Action X Info ✓ Init	Action X Info ✓ Init
[illegible]	RES	LA	D
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[illegible]	AG	WS	S
ABE	CO	[illegible]	SC
RLT	LE	DISP	MAINTE
FIRE	RECP	[illegible]	COMM

R.B. Tippeconnic, Forest Supervisor
Coronado National Forest
FB #42
300 West Congress
Tucson, AZ 85701

Dear Mr. Tippeconnic,

Thank you for your prompt reply to my question about the upcoming Mt. Graham astrophysical project EIS. Thank you, also, for allowing Sarah Davidson to attend the Sierra Club Chapter meeting in Flagstaff this past weekend. She was able to clarify a number of important points.

I wanted to follow up on a few issues that came to mind during these discussions.

1 One was the resolution of the wilderness question on Mt. Graham. Will a final decision on wilderness here be made in the forest plan or will the wilderness decision be made as part of the astrophysical EIS?

I think there are compelling reasons to defer a decision on wilderness until the astrophysical project EIS. It is obvious that the two issues are intimately related; a decision on one will clearly influence a decision on the other. Furthermore, the Forest Service was explicitly directed by Congress to consider the two together. The House Interior Committee's report which accompanied the 1984 Arizona Wilderness Act is very specific:

> "It is the purpose of the wilderness study designation to permit the planning and study necessary for the decisions about the observatory to go forward...The Committee has not placed a time limit on the wilderness study or a date for receipt of a final recommendation on possible wilderness designation. Rather it is the Committee's intention that such a recommendation shall await the outcome of decisions on the construction of the observatory. It is the belief of the Committee that a strong possibility exists that should the decision about the observatory be favorable, a carefully and properly designed wilderness area surrounding the observatory site could be not only compatible with, but also beneficial to, its operations".

I am also hoping that the Forest Service will include as one alternative in the astrophysical project EIS a full-protection alternative that considers designating the entire roadless area on Mt. Graham -- not just the wilderness study area -- as wilderness. Given the controversy over the astrophysical proposal, clearly this is one reasonable option. This option is consistent with the committee report quoted above, and recognizes that a wilderness study boundary is just that -- a line to be further considered and refined as appropriate, rather than a final proposal or designation. Also, Congress, in the 1984 Arizona Wilderness Act, left open the possibility for the Forest Service to recommend wilderness for non-designated roadless lands. Section 103 of the Act, containing the so-called "release" language, was hotly debated and was clearly resolved in favor of leaving this option to the agency's discretion. During the first round of land use planning the Forest Service cannot be forced, pursuant to the 1984 Arizona Wilderness Act, to restudy non-designated roadless areas for wilderness, but neither can it be stopped from doing so. Because the agency retains this discretion, the National Environmental Policy Act requires that the Forest Service consider as a reasonable alternative the recommendation of the entire Mt. Graham roadless area for wilderness in the astrophysical EIS.

2 Will the Forest Service consider wilderness for the entire Mt. Graham roadless area as an alternative in the astrophysical EIS?

3 One final point seems useful to clarify. Who will be making the final decision for the astrophysical project EIS? I've heard that it may be the Regional Forester rather than you, as Forest Supervisor.

Thank you for your continuing help in getting information to the public. It's very much appreciated and encourages constructive involvement with the Coronado's activities.

Sincerely,

Rob Smith

Rob Smith
Associate Southwest Representative

Agency response to
Sierra Club,
Southwest Office

1. The allocation decision for the Mt. Graham Wilderness Study Area is being made in the Forest Plan. The Forest Plan was revised to recommend a wilderness designation for all 62,000 acres of the WSA. Our analysis and public comment now indicates there are no conflicts between this wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development.

2. The Mt. Graham Astrophysical EIS will consider a wilderness option for the roadless portion of the 3500 acres being considered for an astrophysical area. Other roadless portions of the Pinaleno Mountains outside the WSA will not be considered for a wilderness option.

3. The Regional Forester, Southwest Region is responsible for the final decision on the proposed Mt. Graham Astrophysical Area.

0039

16721 Palmero Drive
San Diego, CA 92128
August 6, 1985

Forest Supervisor
Coronado National Forest
300 West Congress
Tucson, AZ 85701

Dear Mr. Tippeconnic:

In May of this year I wrote a letter to the District Ranger in Douglas, AZ, expressing my interest in the possibility of designating the South Fork area of Cave Creek Canyon as a ZBA in the developing management plan. Mr. Brunner, the District Ranger, responded and assured me that the draft form did recommend this option.

Later, I received your package of copies of the draft EIS, the proposed Forest Plan, and relevant maps. I have read them carefully, and thank you for them.

I think your Proposed Action Plan is the best. My ideals are probably closer to Plan D, with its emphasis on the natural environment and "amenity" outputs, but we do not live in an ideal world without budget constraints. Also, there are other valid uses of our forests which differ from mine. I prefer to vote with the professionals who have given the subject their best judgement.

I must say, however, that I live in the hope that it will not be too long before the current political climate concerning the use of natural resources will be recognized for its long term failure. I agree with the quote from Neil Sampson, the Executive VP of the AFA, in the July AMERICAN FORESTS: "The American public simply has not yet agreed on how the National Forests should be managed....We can't manage for mutiple use and environmental quality while still maximizing revenues on a short term basis."

In the meantime, the professional managers of our National Forests are doing a great job in trying to balance between the pressures from both sides of the issues. Keep up the good work!

Sincerely,

Elwin N. Sire

Elwin N. Sire

P.S. I do not expect an answer to this letter. You already have too much paper work!

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

AUG 8 1985

RECEIVED

CORONADO N. F.
JUN -3 '85

DOUGLAS RANGER

Received 5-24-85

0002

16721 Palmero Drive
San Diego, CA 92128
May 22, 1985

District Ranger
U. S. Forest Service
Douglas, AZ 85607

Dear Sir:

This letter is an expression of my interest in Cave Creek Canyon, particularly on two subjects.

The first concerns the South Fork area. I understand that it is currently being considered for a special designation in the Management Plan, as a Botanical and Zoological Area. It is my hope that this designation will be approved. This area is almost unique as the northernmost habitat of several sub-tropical species of birds, and lying within the political boundaries of the United States makes it of very high interest to an increasing number of people interested in ornithology. I doubt that the area has much value for commercial timber, but increasing use of the canyon for recreational purposes could pose habitat problems. If such a designation did nothing more than provide a basis for placing signs indicating its status and the rules that apply it would be a help.

The problem of increasing public use of the canyon, primarily by "birders", but also by other hikers and campers, leads to my second concern; Cave Creek Canyon needs more active management. I can imagine a wry smile as you read this, knowing quite well some of the practical budget limitations under which you must operate. Recreation is not where "the bucks" are, and I know that whatever the amount of fee dollars collected is simply lost back into the federal treasury, as far as your budget is concerned. It just seems to me that the need to cope with the real facts of public usage ought to get more consideration than it does. I assume that the only real solution to this problem is a change in the political policies at the top. But until that happens (we can live in hope, anyway!) I hope it may be possible for the Coronado Forest to shuffle a few positions to permit the assignment of a "recreation" type person to Cave Creek.

Having got these two matters off my chest, I want to add that I think the Forest Service is doing a great job, most of the time, in balancing between the constant pressures of environmental concerns and political/industrial demands. I have a high respect for the professional leadership within the Forest Service, and am optimistic that it will prevail in the long run. "Happy Trails!"

Sincerely yours,

Elwin N. Sire

Elwin N.Sire

Agency response to Elwin N. Sire

We share your concerns regarding management of Cave Creek and appreciate your support of our management efforts.

The Forest Plan does recommend designating the South Fork Area as a zoological-botanical area.

The Forest Plan also provides more intensive management for South Fork and the main fork of Cave Creek. Public information and education programs will be an important part of managing these areas. All resource use will be monitored for impacts and will be controlled if there is a threat to the flora and fauna values.

Received
8-1-85

0087

COMMENTS

Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

All comments must be received by the Coronado National Forest no later than

______________________.

Please print or otherwise write legibly - Thank you.

Comments: I firmly believe the Forest Service should be left in charge of their present boundaries. I do prefer the prefered management program. The forest service has and is doing a fine job in this area — showing the highest of concern for everyones interests.

Sincerely,

Ben R. Smith
Box 226
Safford, Ariz.
85546

Name:

Date:

Address:

Agency response to Ben L. Smith	Thank you for your interest and support of the Proposed Coronado National Forest Plan.

0186

COMMENTS

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
AUG 23 1985
RECEIVED

Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

All comments must be received by the Coronado National Forest no later than
__________________________.

Please print or otherwise write legibly - Thank you.

1 Comments: I read the summary of the Coronado Nat.
Forest DEIS, and was dismayed by your preferred
alternative, and was even disappointed by the best
alternative you offer — D. The preferred
alternative protects only a small portion of the
Forest and allows distructive activities on the
remainder. Alternative D is the best, in that it
maximizes Wilderness designation, but it still
allows development atop Mt. Graham and allows

2 too much timbering and grazing. For the sake
of wildlife, the Arizona public, and even for
economic sensibility (as alternative C proves that
allowing special interests to exploit the Forest is not
economically efficient), please designate all of the
Coronado lands under study as Wilderness.

Name: Hermon Snootch

Date: 8-20-85

Address: c/o 2721 West Calle Carapan
Tucson 85745

Agency response to Hermon Snootch

1. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

2. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

   Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

   The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

   The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

   Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

   The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

Agency response to
Hermon Snootch
(continued)

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

COMMENTS

0092

Mail Comments to:
Coronado National Forest
Forest Supervisor
Federal Building
300 West Congress
Tucson, Arizona 85701

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
AUG 22 1985
RECEIVED

All comments must be received by the Coronado National Forest no later than ____________________.

Please print or otherwise write legibly - Thank you.

1 Comments: 1/ I am opposed to routing electric power lines from the Apache plant to Sierra Vista along the East side of the mountains because it will ruin the scenic beauty of the Stronghold, probably impair two other historic sites, possibly effect peregrine falcons adversely, cause distress & lessen property values in the community of Sunsites, injure the businesses or ranches that lie along that route. And because I should think it would be cheaper to run the lines along highway already existing & then through land that is not presently developed.

2 2/ I withhold my opinion on the observatory on Mt. Graham until I have more information. My question now is whether our Space Program won't soon make such an installation unnecessary anyhow.

Name: P. Sonneborn

Date: 8-20-85

Address: Box 366
Pearce, AZ 85625

3 3/ With the federal budget deficit so alarmingly high, I oppose the present un- → businesslike policies of leasing federal lands for grazing at much less than it costs to do so, & of constructing logging roads to move out timber that won't sell for enough to cover those expenses. Cattle don't improve the land. Loggers certainly don't. The only excuse for this kind of land use is to make a profit. If you can't do that let the wilderness alone. And get out of my pocketbook — as a taxpayer I'm sick of subsidizing ranchers & big business. If I'm going to contribute dollars, I want to do it in a way that preserves or helps the land, not in ways that degrade it.

Agency response to
P. Sonneborn

1. Your comments on the proposed Apache Plant powerline have been noted and will be considered in development of the separate EIS being prepared by the REA and Arizona Power Company.

2. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

3. The Coronado National Forest manages timber resources primarily to achieve recreation and wildlife objectives. Only ten miles of road to access fuelwood are planned.

   Livestock grazing is a legitimate use of National Forest lands as long as it is managed properly. The question of grazing fees on public lands is beyond the scope of the Forest Plan. That issue is being considered by Congress at this time.

   As a matter of principle, we do not believe that it is appropriate to single out Forest Service range permittees or timber operators as being the sole recipients of a federal "subsidy." Practically speaking, a subsidy exists whenever an individual receives benefits in excess of the fees paid by that individual to enjoy those benefits. Another way of expressing this would be to view it as an income or wealth transfer. This kind of income redistribution does not necessarily involve the actual transfer of cash. For example, in the case of a recreation user who pays no fees or only a nominal fee to use the National Forest, the user is receiving a considerable benefit without having to pay the full actual cost of providing that benefit. Since the source of the Forest Service recreation management funds is the public treasury, it could be said that all recreation users on the National Forest are being subsidized. Viewed from this perspective, almost all of the use and enjoyment derived from the Coronado National Forest could be considered to be a subsidy. This kind of subsidy would include virtually all developed recreation use, dispersed recreation use, skiers, bird watchers, wilderness users, hunters and fishermen, all downstream water users who benefit from watershed management, private property owners who benefit from Forest Service fire protection programs, range permittees, firewood users, anyone who uses a Forest Service road, etc. The potential list of Forest users who could be considered to be the recipients of a subsidy or income transfer is practically endless. Under the existing rules of our society, the public sector provides many such subsidies which touch the lives of all citizens. The ultimate decision of who receives a subsidy and who pays, rests with the elected representatives of the people; in other words, it is a political decision. The U.S. Forest Service, as custodians of public trust lands, operates under authorities granted by the U.S. Congress and is not empowered to make the ultimate decision of who is subsidized and who pays. In summary, the subsidy issue which you raise is indeed a critical issue. However, it should be remembered that range permittees and timber operators are but two among many National Forest users who receive benefits in excess of the costs necessary to produce and distribute those benefits.

0389

SPARKS & SILER, P. C.
ATTORNEYS
7503 FIRST STREET
SCOTTSDALE, ARIZONA 85251-4573
(602) 949-1339

JOE P. SPARKS
E. DENNIS SILER
KEVIN T. TEHAN
MICHAEL C. SHIEL
MARGARET J. VICK
DONALD D. LOEB

CAREFREE, ARIZONA
SUNDIAL CIRCLE, SUITE I
PLEASE DIRECT MAIL AND CALLS TO
SCOTTSDALE OFFICE

September 4, 1985

Mr. Robert B. Tippeconnic
Forest Supervisor
Coronado National Forest
301 W. Congress
Tucson, AZ 85701

Re: Draft Environmental Impact Statement for Coronado National Forest

Dear Robert:

Mr. Jim Crowther of the Bureau of Indian Affairs has enformed me that a Draft Environmental Impact Statement for the Coronado National Forest, a Proposed Plan for the Coronado National Forest and a set of maps are available for review and comment.

Please send a copy of these documents to our office so that we can review them with the San Carlos Apache Tribe and provide comments before the September 30, 1985 deadline.

Mr. Crowther informed me that the draft EIS contains a management plan for the 11,000 acres belonging to the Tribe within the Mineral Strip. I am sure that this is an oversight on your part and will be corrected prior to finalizing the EIS and the plan.

Sincerely,

SPARKS & SILER, P. C.

Margaret

Margaret J. Vick

c: Ned Anderson

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
SEP 6 1985
RECEIVED

Copies mailed
9-6-85-

Agency response to Sparks & Siler, P.C.

1. Please see our response to your similar letter dated October 10, 1985.

0712

SPARKS & SILER, P. C.
ATTORNEYS
7503 FIRST STREET
SCOTTSDALE, ARIZONA 85251-4573
(602) 949-1339

JOE P. SPARKS
E. DENNIS SILER

KEVIN T. TEHAN
MICHAEL C. SHIEL
MARGARET J. VICK
DONALD O. LOEB

CAREFREE, ARIZONA
SUNDIAL CIRCLE, SUITE 1

PLEASE DIRECT MAIL AND CALLS TO
SCOTTSDALE OFFICE

October 10, 1985

Certified Mail - Return Receipt Requested

CORONADO N. F.

OCT 11 '85

TR	4EB	LA	D
LMP	B&F	ARCH	R
AO	PER	WL	CV
ENGR	AS	WS	S
RGE	CS	SLS	SC
RLT	LX	DISP	NARTC
FIRE	RECP	PIQ/IS	COMM

R. B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 W. Congress
Tucson, AZ 85701

Re: San Carlos Apache Reservation

Dear Robert:

Our office has reviewed the Proposed Coronado National Forest Plan (Plan) and the draft Environmental Impact Statement for the Coronado National Forest on behalf of the San Carlos Apache Tribe. The Plan proposes management of approximately 11,000 acres within the San Carlos Apache Reservation which is outlined in red on the enclosed copy of a portion of the Proposed Action map.

A map of the Proposed Action dated June, 1985 (03-05-85-01) for the Safford Ranger District No. 1 includes the land within the San Carlos Apache Reservation in Management Area 4, livestock grazing (Level D) Game Habitat and fuelwood harvest and Management Area One, visual resources and semi-primitive dispursed recreation.

As you personally are aware and the Forest Service acknowledged more than ten years ago the land in question is a part of the San Carlos Reservation which was wrongfully included in the National Forest. The land was restored to the Tribe by Secretarial Orders dated June 17, 1963 and January 16, 1969.

1 The Tribe requests that the land within the Reservation be deleted from the management plan and maps. 2 The Forest Service has no authority to permit any use or entry of this land. Any entry into the Reservation by individuals or livestock not authorized to do so by the Tribe will be subject to the appropriate Tribal and Federal law, including damages for trespass, confiscation of livestock, and charges for grazing and fuelwood cutting.

Any designation that this part of the Reservation is open for entry by the public or any permitted entry by the Forest Service, other than Forest Service Personnel, will be considered an intentional trespass and the Forest Service and its personnel will be held liable for any and all damages resulting therefrom.

3 The Forest Service wrongfully permitted mineral entry and exploration within this area of the Reservation until all such claims were voided ab initio by the Bureau of Land Management in 1984. The Tribe has not yet determined their damages from this entry. Furthermore, the Forest Service has wrongfully permitted grazing within the mineral strip. You not only have a fiduciary obligation on behalf of the United States to protect this asset for the benefit of the Tribe, but also to avoid the risk of increased damage claims against the Forest Service by the Tribe due to trespass.

4 The Plan also includes proposed right-of-way designations. In table 11, page 29, the Safford District lists rights-of-way for Goodwin Wash and Black Rock Roads as their number two and three priorities for acquisition of rights-of-way. These roads are within the Reservation and should be deleted from lists of rights-of-way and also from road designations on all maps and other information available to the public. These roads are open to Forest Service personnel for administrative purposes, but are not open to the public.

If you have any questions or comments regarding this or any other matters with the San Carlos Apche Tribe please notify our office.

Sincerely,

SPARKS & SILER, P. C.

Margaret

Margaret J. Vick

c: Ned Anderson, Chairman
Tribal Council Members
Jim Crowther, Area Office, BIA

CORONADO *National Forest*

ARIZONA – NEW MEXICO

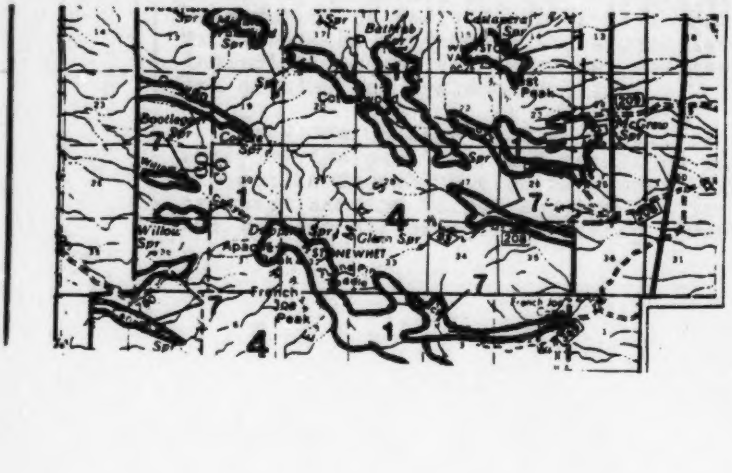
LAND AND RESOURCE MANAGEMENT PLANNING

PROPOSED ACTION

(PROPOSED FOREST PLAN)

JUNE 1985

03-05-85-01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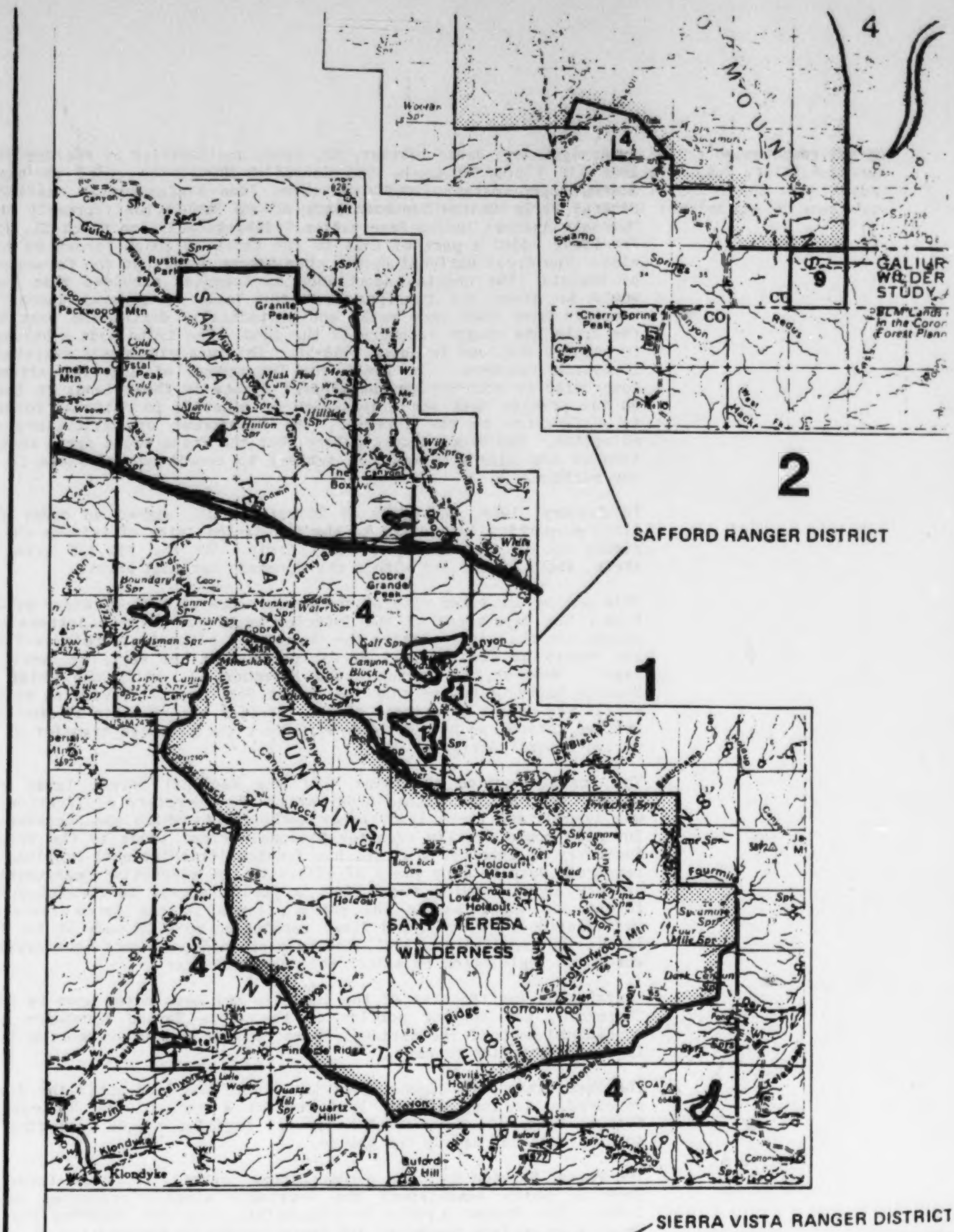
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Cherry Spring
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SAFFORD RANGER DISTRICT
SANTA TERESA
4
Rustler Park
Packwood Mtn
Granite Peak
Limestone Mtn
Cobre Grande Peak
1
SANTA TERESA MOUNTAINS
9
SANTA TERESA
WILDERNESS
Holdout Mesa
Cottonwood Mtn
Pinnacle Ridge
Devils Hole
4
Quartz Hill
Buford Hill
Klondyke
SIERRA VISTA RANGER DISTRICT

Agency response to
Sparks & Siler, P.C.

1. By an agreement dated February 25, 1896, and ratified by the Act of June 10, 1896 (29 Stat. 360), the San Carlos Indian Tribe ceded to the United States approximately 232,000 acres of land designated as the San Carlos Mineral Strip in the southern part of the San Carlos (formerly the White Mountain Apache) Indian Reservation. Subsequently, on March 21, 1917, the President added a part of this to the Crook National Forest by proclamation. The Crook National Forest then became a part of the Coronado National Forest. The cession acceptance by Congress provided that the Tribe would be given any receipts from the "sale of mineral lands." These receipts have been very small and periodically during the past 50 years the Tribe has sought recovery of the land. The Tribe made a strong effort to acquire the land in about 1958-59. This was vigorously resisted by the livestock ranchers. In 1963, the Department of Interior attempted to compromise by reconveying the mineral rights in these lands to the Tribe. On the premise that the disposition of minerals in National Forest lands is a function of the Interior, the Department of Agriculture made no objection. The Order did stipulate that the Tribe would agree that extraction of the minerals would be subject to conditions adequate to protect the surface.

   In January, 1969, Secretary of Interior Udall signed an order (34 F.R. 1195) purporting to restore to the San Carlos Tribe of Arizona the surface rights to the San Carlos Mineral Strip. Of the 232,320 acres in the strip, about 10,650 are within the Coronado National Forest.

   This action was taken without the concurrence of the Secretary of Agriculture. The Department of the Interior received numerous letters and opinions over the years stating the Department of Agriculture's position that the return of the National Forest portion of the strip by order was not legal. However, by letter dated November 17, 1976, the Chief advised Senator Barry Goldwater that the Forest Service was "reviewing with representatives of the Department of the Interior the question of what administrative action can now be taken to affect the proposed transfer of the San Carlos Mineral Strip."

   The Forest Service maintains that the National Forest lands were not subject to the authorities under which the Secretary of Interior's Order was issued, and there is no other authority by which the Secretary of the Interior could legally transfer National Forest lands to the Tribe. The Secretary of Interior's action has created jurisdictional problems not yet resolved, despite many years of effort by the respective Departments. The primary issue needing resolution is public access to remaining National Forest and other public and private lands in the Santa Teresas. The jurisdictional question and final resolution must be made at the National level. During 1984 and 1985, the respective Departments have reviewed and worked on legislation to affect this land transfer.

   Legislation for transfer of the land has not been acted upon by Congress. Therefore, the subject portion of the Santa Teresa Mountains is still considered part of the National Forest System and no correction is needed in the Forest Plan or maps.

2. The Forest has the responsibility to manage the land until the dispute is resolved. As long as the land remains a part of the National Forest System, they will be available for all legitimate uses including grazing and recreational use by the public.

3. The Forest Service does not permit mineral entry. It is the Department of Interior which administers the locatable mineral resources of public lands. The Forest Service is responsible only for insuring any adverse impacts to surface resources are minimized during exploration or extraction of those mineral resources.

4. Public access needs are listed in the Forest Plan by road name or number, regardless of landownership status. This listing does not imply that a

Agency response to Sparks & Siler, P.C. (continued)

legal right-of-way exists. The Forest Service has the responsibility to acquire public access to public lands. The Goodwin Wash and Black Rock Roads are needed for public access to National Forest lands within the Santa Teresa Mountains. The road listing thus remains as a need for public access.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

SEP 27 1985

RECEIVED

MRS. WALTER R. SPOFFORD
RANCHO-AGUILA, BOX J
PORTAL, ARIZONA 85632

0471

25 September, 1985

Mr. R.B. Tippeconnic, Forest Supervisor
Coronado National Forest
300 West Congress St.
Tucson, Arizona 85701.

Dear Mr. Tippeconnic:

I have studied the proposed plan for management of the Coronado National Forest and wish to congratulate the personnel for a tremendous and commendable piece of work. I would like to make the following comments.

1 First, I prefer Alternative D to the others in almost every one of its proposals, chiefly because it seems to go the farthest toward protection of the environment. If Alternative D were not to be chosen, my preference would then be your PA over any of the others.

2 It was with pleasure that I read that the Forest recommends making the South Fork of Cave Creek a ZBA, and the main canyon RNA, and I also support making Guadalupe Canyon a ZA.

3 In regard to South Fork, the following are my thoughts. There is provision for omitting from the ZBA a strip 10' wide on each side of the road. It occurs to me that it might be better to use a prescribed distance from the middle of the present road, as "edges" may vary over a period of time.

4 The present camp-ground, wich I hope will be converted to day use, does not have clear boundaries, as cars have forced their way farther and farther up the path and along the sides, making 'new'camp-sites. To simply exempt 'the campground' from ZBA is quite indefinite, if its dimensions are not delineated. In contrast, boundaries of the two recreational camps or cabins are quite definite.

I fail to see provision for keeping vehicles out of the camp-ground as we have been urging, unless "vehicle control" on page 118 of the Plan means barring vehicles. What constitutes 'vehicle control'?

5 I would prefer to hve no grazing in South Fork - i.e., level A. The riparian habitat is delicate and there is not much grass anyway, in lower South Fork. Removing South Fork from grazing would mean eliminating only a small percentage of acreage now available for grazing in the rest of the Forest.

6 In the over-all Forest Management Plan I do not support the proposal to solve present 'over-grazing' (i.e. grazing exceeding carrying capacity) by upgrading habitat rather than reducing number of head allowed. At least numbers might be reduced until habitat is upgraded, the latter a seemingly rather indefinite goal.

7 I support making all WSAs Wilderness. 8 I also support the strictest control of the use of ORVs.

9 While I recognize the validity of established mineral rights, I would hope that more areas would be withdrawn - at least those areas into which it would be necessary to build and maintain more roads to reach the mines. It seems that the mine itself does little damage, but the travel of heavy equipment over newly-built roads is harmful to the ecology. Also, claims being used as an excuse to 'live off the land' should not be allowed.

10 I'd like to see more funds put into law enforcement in the Forest, but not at the expense of educational programs. This probably is difficult or impossible to realize.

11 I worry about increasing pressure for an increase in permitted fuelwood cutting, and hope that no new roads will be built to open other areas for cutting.

12 In regard to re-establishing John Hands and Herb Martyr as trout-fishing lakes, I would have no objection except for my concern over the possible increase in traffic and more cars pushing into the camping (i.e. picnic) areas. John Hands has suffered somewhat in recnt years from lack of vhicle control and enforcement of camping regulations.

13 Finally, while it would not be a responsibility of the Forest, I would like to see camping areas outside of but close to the Forest boundary rather than more or larger ones within the Forest. There are people who come, not for a 'Wilderness experience' or to commune with Nature, but simply to picnic away from the city, bringing with them their urban comforts - TVs, radios and noisy generators. These seem out-of-place in most areas of the Forest.

14 The over-all goal should be to preserve as much of the Forest as possible in its present, or improved condition, for the enjoyment of future generations. It seems to me that the Proposed Management plan is aimed in that direction.

Sincerely,

Sally H. Spofford.
Sally Hoyt Spofford (Mrs. W.R.)

Agency response to
Sally H. Spofford

1. All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

2. The Coronado Forest Plan does recommend a zoological/botanical designation for the South Fork of Cave Creek. It also recommends a zoological designation for Guadalupe Canyon. The management direction for these two areas is found in the prescription for Management Area 14.

   The Forest Plan does not recommend a research natural area (RNA) designation for the Main Fork of Cave Creek. Management direction for this area is prescribed in Management Area 3. The management emphasis will be on wildlife habitat and recreation use.

   Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually precludes or severely restricts most resource uses, including recreational activities.

3. Thank you for your suggestions for defining the road and other exclusions to the zoological/botanical area. We feel the intent of the exclusions are clear and will use your suggestions and others in making the final boundary delineations as we implement the Plan.

4. The Forest Plan calls for converting the South Fork Recreation Site to day use. The intent of the Forest Plan is to also provide vehicle barriers to prevent further expansion of and damage to the South Fork Recreation Site. These may have to be temporary measures until the total site planning and implementation can be completed. The Douglas Ranger District plans to install these barriers in the spring of 1986 prior to the heavy use season. The barriers will also serve to define the limits of the recreation site.

   Vehicle control as referred to on page 118, DEIS means the barriers mentioned above. There was no intent to prevent vehicles from traveling to and parking within the limits of the recreation site.

5. The 762 acre, Zoological/Botanical Area is part of an established livestock grazing allotment. Elimination of this portion of the allotment from grazing would require expensive and, we believe, unnecessary management practices such as fencing.

Agency response to Sally H. Spofford (continued)

Moderate, well-managed grazing has proven to be compatible with the riparian and other sensitive values in the Cave Creek Area. Both forks of the canyon have been grazed for many years, and the areas are well-known as a showcase of riparian vegetation and unique birdlife. We agree that the unique resources of the area must take priority over production of livestock forage, but feel that it has been demonstrated that the two uses are not mutually exclusive.

6. We agree with you that it will be necessary to temporarily reduce grazing, while measures to improve the land's capacity are undertaken. This is the reason that the Forest Plan predicts a reduction from the present 400,000 AUMs to 350,000 in the first period and 338,000 in the second period. As the range responds to improved range management, coupled with decreased numbers, use will be allowed to follow the rising capacity. It is anticipated that long term productivity will be at about 360,000 AUMs, about ten percent less than present.

7. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enchanced by the

Agency response to
Sally H. Spofford
(continued)

addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

8. The purpose of the planned policy is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

   The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

   In some areas of the Forest, such as the South Fork of Cave Creek, motor vehicles would not be permitted on trails.

9. The Forest Service manages the surface resources involved with mining operations primarily through the use of operating plans developed in conjunction with the miners. The only roads allowed are those necessary to meet the needs of the particular mining operation.

   We agree that mining claims should only be used for legitimate purposes. When abuses occur, we must go through the legal process of determining the validity of the claim in question. This is often a time-consuming process.

10. As you have noted, it is difficult to reach a balance in the distribution of people and money to do all the jobs involved in managing a National Forest. For the most part, law enforcement and educational jobs are done as a part of resource management jobs. In some places, such as South Fork, additional special efforts are needed and the Forest Plan provides for increased emphasis on law enforcement and education.

11. Due to the limits of supply, the Forest will not be able to meet current or future demands for fuelwood. Fuelwood harvest under the Forest Plan is based on a sustained yield from areas currently accessible or where access can be reasonably gained. Fuelwood harvest is a management tool to meet other resource objectives such as maintaining healthy stands of trees and improving wildlife habitat. To meet these objectives while utilizing the wood fiber, additional road access may be necessary. We estimate that about ten miles will be needed during the plan period.

12. If traffic and vehicles become a problem within the John Hands and Herb Martyr recreation sites, management actions will be prescribed to avoid or eliminate the problems. These actions may include installation of vehicle barriers and enforcement of regulations.

Agency response to
Sally H. Spofford
(continued)

13. We recognized in our Forest planning process that the Forest would not be able to meet all of present and future recreation demands. We agree that the private sector and other public land managing agencies must share in providing the various recreational opportunities needed to meet total demand. We plan to encourage private development in every way we can.

14. We agree. One of the goals of any National Forest Plan is to retain as many future options as possible while meeting current needs and desires of the public.

0470

Walter R. Spofford

AGUILA-RANCHO
PORTAL, ARIZONA 85632

26 Sept. 1985

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
SEP 27 1985
RECEIVED

Mr. R. B. Tippeconnic
Forest Supervisor,
Coronado National Forest,
300 West Congress St.,
Tucson, AZ., 85701

Dear Mr. Tippeconnic:

This letter is in regard to appraisal of the Proposed Forest Plan. In regard to the six proposed courses of action, my preference is for alternative D (environmental considerations and wildlife).

and my second choice is the PA (Proposed Action).

I have one overall criticism of all proposals:

1 In no way is there any choice on cattle use.....they are all to increase cattle use (except A...present use level). The recreational user of the forest must contend with continued degradation by cattle.

It is certainly clear that the recreational users of the forest far outstrip commodity users of the forest, and it is difficult to see why the preponderant users (recreational) are downgraded, in favor of a small minority.

I do appreciate the tremendous time & energy that the forest has taken to come up with plans that are so thorough and inclusive.... ! with the exception of the pro-cattle bias.

My particular and local concern is with Management Area 14....South Fork in the Chiracahua Mountains.

In regard to the Standards and Guidelines)page 84....

2 #2. The proposed picnic area......the presewnt camping use has pushed camping sites beyond 'picnic-levels' and I forsee some restorative work done there. In the discussion group which met in Portal last fall, it was recommended that a protective fence be placed between parking and the picnic use area......at present there are a number of openings where heavy recreational vehicles have forced their way-in.

I am pleased at the designation of ZBA for the South Fork, emphasizing wildlife and botannical considerations as of prime interest.

3 8. In regard to collecting, the resource itself should have first consideration and I believe collecting should be in areas other than ZBA even if this may be an irritation and inconvenience to some.

4 Back to 5. I believe the definition of the road width exclusion as ten feet each side is difficult of delimitation. I think it would be much clearer to define the exclusion in terms of distance from midline of

100% RECYCLED PAPER

4 of the road....such as: 20 feet (or 25 ft.?) each side of center line. Of course this is meaningless at spots where rock walls are close, or where the South Fork creek is close.

5 #7. I believe that the ZBA should be closed to hunting or any use of firearms...the high human use of South Fork for other recreational and scientific uses makes the Safety factor a major consideration here.

In general, I believe the Forest Service has done a remarkably complete and thoughtful review of alternatives, and I particularly espouse Alternative D, but I am also very pleased with the PA.

Sincerely yours,

Walter R Spofford

Walter R. Spofford

Agency response to Walter R. Spofford

1. No increase in livestock use is projected in the Forest Plan. Reported use in recent years has totaled about 400,000 AUMs. It is projected this use will decrease to 350,000 in the First Period and 338,000 in the Second Period. Then, as the range responds to this decrease in use and the improved management practices, use will be allowed to follow the expected rise in capacity. After that point in the Second Period at which capacity and use are brought into balance, use will not be allowed to exceed capacity. If capacity does not improve as anticipated, the projected 360,000 AUM level will not be achieved. In any case, use for the foreseeable future will be about 10 percent less than present.

2. The intent of the Forest Plan is to provide vehicle barriers to prevent further expansion of and damage to the South Fork Recreation Site. These may have to be temporary measures until the total site planning and implementation can be completed. The Douglas Ranger District plans to install these barriers in the spring of 1986 prior to the heavy use season.

3. The flora and fauna values and the public enjoyment of these values will get first consideration over the collection of plants by individuals or groups. This is the primary reason for requiring collecting permits within the proposed Zoological-Botanical Area.

4. Thank you for your suggestions for defining the road and other exclusions to the zoological-botanical area. We feel the intent of the exclusions are clear and will use your suggestions and others in making the final boundary delineations as we implement the Plan.

5. At this time we do not feel there is sufficient justification to close the South Fork zoological-botanical area to hunting or use of firearms. Current State laws should provide sufficient protection, if enforced. This is an item we do plan to monitor and will reconsider if and when necessary for safety reasons or to protect the wildlife resources.

0719

STATE OF NEW MEXICO

OFFICE OF CULTURAL AFFAIRS
HISTORIC PRESERVATION DIVISION

TONEY ANAYA
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CLARA APODACA
CULTURAL AFFAIRS OFFICER

THOMAS W. MERLAN
DIRECTOR

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

OCT 11 1985

RECEIVED

October 10, 1985

R.B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

RE: Review of Proposed Coronado National Forest Plan and Draft Environmental Impact Statement

Dear Mr. Tippeconnic:

Thank you for the opportunity to review the above documents. The following comments pertain only to cultural resource concerns in New Mexico.

We note that cultural resources have been identified as an issue in the planning process for the Coronado Forest. This issue pertains to determining what sites should be nominated to the National Register of Historic Places and the degree of interpretation for cultural resource sites (pages 202-203 of the DEIS). These are very pertinent concerns.

As noted on page 29 of the DEIS, there is essentially very little difference between the various alternatives in regard to their proposed treatment of cultural resources. Page 52 of the DEIS indicates that all alternatives provide for cultural resource survey and compliance prior to ground-disturbing actions. The DEIS also notes that "limited" amounts of interpretation are provided in all alternative except for Alternative A.

The DEIS also suggests that there is a higher potential for inadvertent damage to cultural resources under Alternatives PA, A, B, and E because of the greater amount of ground-disturbing activities in these alternatives. Therefore, considered strictly from a cultural resources standpoint, Alternatives C and D would appear to be the preferred alternatives, although the documents do not provide enough data to determine what the magnitudes of the anticipated impacts to cultural resources will be in any of the alternatives.

In general, the cultural resource data base for the Coronado Forest seems to be minimal. From reading the documents, it is not clear how many of the 800 identified sites on the Coronado Forest are located in New Mexico. A check of the State archaeological site files shows only three sites on record for Coronado Forest lands in New Mexico. We strongly encourage the Coronado Forest to submit copies of any site, survey, and excavation records for its lands in New Mexico to this office, so that this information can be added to the State's comprehensive inventory. We would also appreciate receiving a copy of the draft cultural resources overview that the Forest has completed in conjunction with BLM.

In reference to the Plan and DEIS, we recommend that the Coronado Forest include a better analysis of known cultural resources in the Forest, including distribution of resources by Ranger District, acres inventoried, cultural/temporal distribution of known sites, and site condition. It would be extremely useful for State historic preservation planning purposes if we had some indication of site frequency, type, and condition and present level of inventory in the New Mexico portion of the Forest.

Regarding the proposed management directions outlined in the Plan, we are pleased to see that the Forest will comply with the provisions of the National Historic Preservation Act and Executive Order 11593. However, in the past, this office has been consulted on only a small number of actions. It is difficult to determine if this is a result of a failure on the part of the Forest to comply with 36 CFR 800, or if there are simply very few Forest-authorized undertakings on Coronado Forest lands in New Mexico. To improve the degree of communication, we suggest that the Coronado Forest provide a list of proposed undertakings on New Mexico lands to this office on a regular basis so that we can insure that all projects proceed in compliance with 36 CFR 800.

Regarding the management directions pertaining to wilderness areas, cultural resources in such areas should be managed in accordance with the National Historic Preservation Act in a manner which is also compatible with preservation of wilderness qualities. Wilderness designation should not mean that sites in such areas are ignored from a managemement perspective. Such areas will still require inventory, nomination, surveillance, and protective measures as necessary.

In general, it is difficult to determine the actual levels of protection proposed for cultural resources in any of the alternatives, since there are few performance indicators included in the Plan and DEIS. What is meant by "limited" amounts of interpretation? How many acres of comprehensive, non-project-specific inventory does the Forest anticipate it can complete on an annual basis under the Proposed Action? How does this amount differ from the other alternatives? How many National Register nominations does the Coronado Forest anticipate being able to complete over the period of Plan implementation if the Proposed Action is adopted?

Overall, we encourage a stronger commitment in the Plan to the completion of Section 110 inventories, both for the purposes of land use planning and site registration. If the Forest does not know the extent and distribution of its cultural resources in more than a general way, it cannot effectively plan for the allocation of lands and other resources. This is important since only 1% of the Forest has been inventoried to date.

On a more specific level, we would also like to see more emphasis placed on recordation and surveillance of cave sites. These sites offer the possibility of well-preserved stratified cultural deposits. Yet as noted in the Plan and DEIS, such caves are also extremely prone to being vandalized. If more active steps are not taken to inventory, nominate, and protect such sites in the near future, they may soon be destroyed. This is important since the DEIS and Plan note that recreational use of the Forest is also increasing.

Regarding the monitoring plan outlined on pages 103-104 of the plan, the two items proposed for cultural resources are important. We agree that it is essential to conduct field inspections of ground-disturbing projects to insure that site protection measures are being followed. It is also critical to monitor the effectiveness of the Forest's program to protect sites from vandalism, which is the second item to be inspected.

However, on both items, the Plan should indicate more specific actions to be taken than "automatic review and assessment of pertinent Plan elements by relevant Forest line and staff personnel." For example, for the vandalism prevention category, the Plan could indicate that it will increase surveillance of a particular area, seek prosecution under the provisions of the Archaeological Resources Protection Act of 1979, fence sites off, restrict ORV access to a particular location, offer an increased number of ARPA law enforcement classes, form an "Adopt-A-Site" program of volunteer surveillance, repair damages to vandalized sites, or a number of other protective actions. More action-oriented measures should also be defined for project monitoring.

To summarize, we would like to see a much stronger commitment to the completion of Section 110 responsibilities, including inventory, nomination and protection of significant historic and archaeological sites. The Plan and DEIS should include a better overall analysis of existing cultural resource data and present more specific information regarding proposed management actions for cultural resources.

If we can provide additional information, please do not hesitate to call. We look forward to increased coordination with the Coronado Forest in the future to insure that cultural resources in New Mexico are appropriately integrated into the planning and development process.

Sincerely,

Thomas W. Merlan
State Historic Preservation Officer

TWM/NW

Agency response to
State of New Mexico
Office of Cultural
Affairs, Historic
Preservation
Division

Standards and guidelines for management of cultural resources will be revised to assure consistency with the requirements contained in the settlement agreement entered as final judgement in the Region 3 cultural resources lawsuit (Save the Jemez, et al., vs. Block, et al.; State of New Mexico vs. Block and Peterson). This agreement contains minimum standards for the following: design and execution of on-the-ground inventories; training and supervision of personnel conducting cultural resource management work; marking, protection and inspection of identified cultural resources during undertakings; damage assessment procedures and prosecution of damage claims; nomination of cultural resources to the National Register of Historic Places; inspection of National Register and other properties; site stabilization and repair; recording and data recovery for sites to be affected or destroyed; protection of cultural resources from vandals; management and conduct of undertakings; treatment of sites discovered during undertakings; and data sharing with State Historic Preservation Officers.

The settlement agreement also requires that within 18 months following October 1, 1986, Region 3 Forests will review and further address the cultural resource elements provided for in Forest Planning (36 CFR 219.24). The level of detail to be included in this effort will be defined in Regional guidelines developed in consultation with appropriate State Historic Preservation Officers. The final Forest Plan will specifically provide for the expansion of these cultural resource elements in accordance with the terms of the settlement agreement.

THE UNIVERSITY OF ARIZONA
TUCSON, ARIZONA 85721

STEWARD OBSERVATORY

TELEPHONE: (602) 621-2288
TELEX: 467175

0624

October 8, 1985

CORONADO N.F.
OCT 10 '85

Action X Info ✓	Init	Action X Info ✓	Init	Action X Info ✓	Init	Action X Info ✓	Init
__ FS		__ RES		__ LA		__ D	
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__ AG		__ PER		__ WL		__ SV	
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__ RLT		__ LE		__ DISP		__ KARTC	
__ FIRE		__ RECP		__ PIO/IS		__ COMM	
__		__		__		__	

Mr. Robert Tippeconnic
Forest Supervisor
Coronado National Forest
301 West Congress
Tucson, Arizona 85701

Dear Mr. Tippeconnic:

I am writing on behalf of the University of Arizona's Steward Observatory to express our views on the Proposed Coronado National Forest Land Management Plan and Draft Environmental Impact Statement currently under public review.

We hope the following management alternatives will be considered when the plan is being finalized:

1 1) The option for an Astrophysical Observatory should be included in the Pinaleno Mountains (Safford Ranger District). This would serve the national and international astronomical communities in addition to the needs of Steward Observatory. We hope that no management alternatives will be adopted that would adversely affect the work of the Observatory.

2) The Wilderness Study Area surrounding the proposed astrophysical site would be beneficial to the Observatory. It would act as a "buffer zone" to limit certain activities which may harm the Observatory as well as the environment (e.g. mining).
2 We can see no reason why lands currently considered for Wilderness designation should be materially affected by the proposed powerline corridor (which the Observatory would need) or a proposed tram/air corridor (which is not part of the Observatory plans).

3 3) In planning for the Observatory it became clear to us that, even without the Observatory, the public use of Mt. Graham will increase with the population of Arizona. The corresponding impact on such delicate areas as the cienegas should therefore be considered in any management plan. The Observatory may be one way to provide some measure of protection.

Overall, the Coronado Land Management Plan and Draft Environmental Impact Statement seems to reflect a thoughtful and thorough assessment of the "multiple use" philosophy inherent in Forest Service management policies. We appreciate what the Forest Service has done to date to ensure the fair management of public land.

Sincerely,

Pete Strittmatter

Peter A. Strittmatter
Director

/mc

2-10-7-1

Agency response to Steward Observatory

1. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We appreciate the cooperation you, as the proponent, have given us in the environmental analysis and preparation of the EIS.

2. The Forest Plan now recommends a wilderness designation for all 62,000 acres of the Mt. Graham WSA. Our analysis and public comment now indicates there are no conflicts between this wilderness allocation and any future allocation for the proposed Astrophysical Area whether it be development or no development.

3. We agree. The analysis of potential impacts to the cienegas will be displayed in the Mt. Graham Astrophysical Area EIS.

THE UNIVERSITY OF ARIZONA
TUCSON, ARIZONA 85721

STEWARD OBSERVATORY

TELEPHONE: (602) 621-2288
TELEX: 467175

0708

17.Oct.85

John Turner
Coronado National Forest
301 W. Congress
Tucson, AZ 85701

Dear John:

I want to thank you for the opportunity to comment on the proposed electronic site at West Peak in the Pinaleno Mountains.

1 If the proposed astrophysical site in the Pinalenos receives Forest Service approval, future development of West Peak as an electronic site would potentially cause difficulty for submillimeter astronomical observations. We would, therefore, like to be kept informed about the site and any future developments.

Attached is a memorandum and additional data regarding interference potential from Dr. Robert Martin from the Submillimeter Telescope Facility staff.

Once again, thank you for this opportunity to comment on this important matter.

Sincerely,

Lauray

Lauray Yule
Special Assistant to the Director

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 21 1985
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enc.
ldy

MEMORANDUM

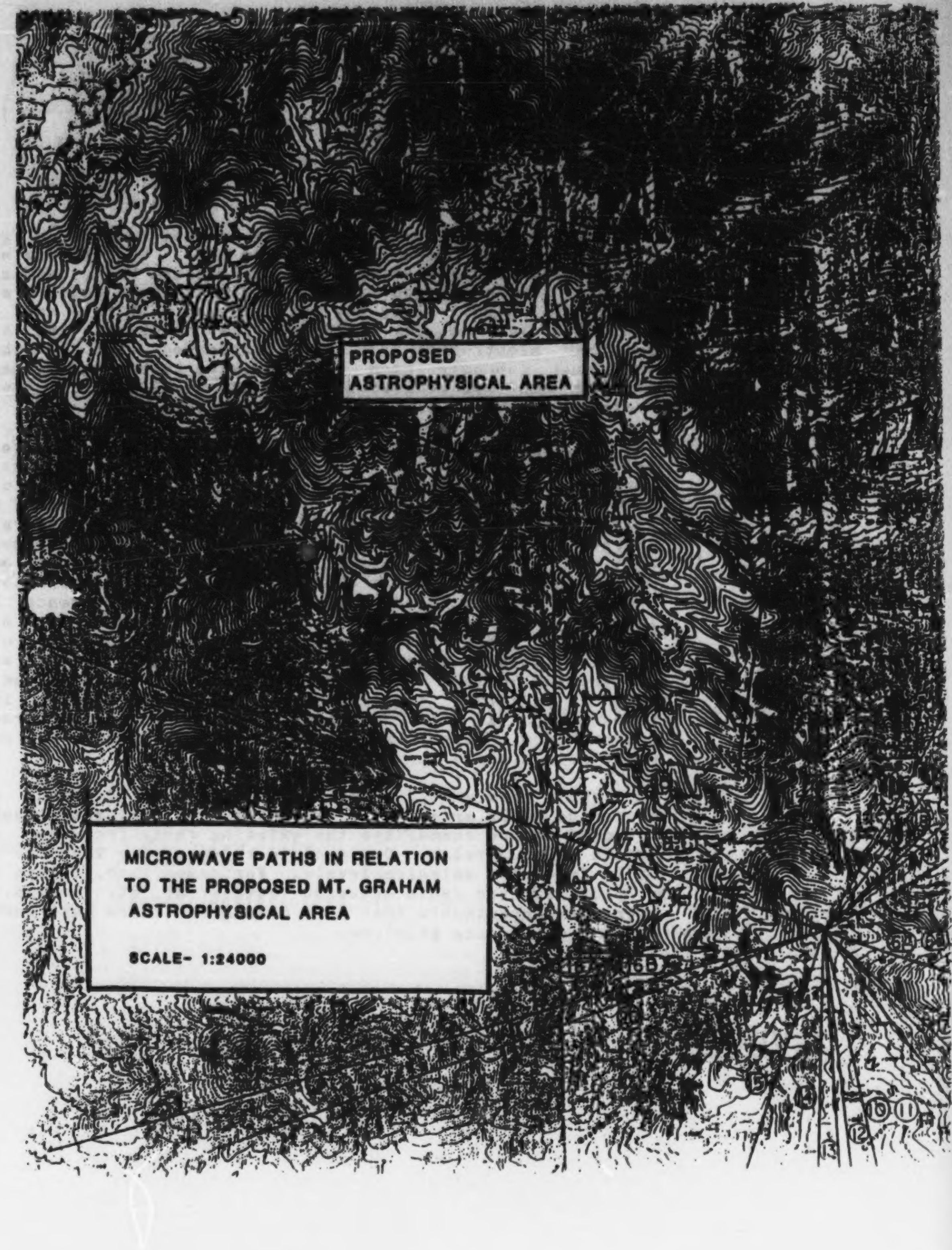
OCT 1985
RECEIVED
STEWARD
OBSERVATORY

To: John Ratje, Lauray Yule
From: Robert Martin RJM
Re: West Peak Electronic Site
Date: 16 October 1985

The proposed electronic site at West Peak is a potential problem for us, especially for the SMT. The effects would be similar to future development on Heliograph Peak, and could be worse if the development is a microwave link to Safford since Mt. Graham is almost along the path between West Peak and Safford. The main problem for the SMT is that much of the sensitive receiver electronics can be interferred with by the radio emissions commonly used for microwave links and radar. The problem has been addressed in the Mt. Graham Site Development Master Plan, but I will repeat our position here.

The scientific utility of Mt. Graham as a site for radio telescopes can be greatly harmed or destroyed unless sufficient controls are enacted which preserve the present state of radio frequency emission levels. It is highly desirable if we have some control over the installation of future transmitters or the increase in effective radiated power of existing transmitters. Just as lights near optical.telescopes cause light pollution which hamper scientific observations, radio transmitters near radio telescopes pose potential radio interference hazards. Indeed, the problem can be more severe in the case of radio telescopes since the transmitters not only interfer with the signals being observed but can interfer with sensitive electronics being used to detect the weak radio signals from space. In order to protect the capital investment in radio telescopes, it is necessary to limit future growth in transmitters, especially those at certain frequencies and those whose path crosses the telescope site.

For reference, the attached figure depicts existing microwave paths arriving or emaniting from Heliograph Peak. The attached report summarizes the existing radio frequency emission levels on Mt. Graham. Our goal is to avoid any increase in these radio frequency emission levels. For comparison, I have included a plot of the radio emission levels at Mt. Lemmon. Radio astronomy experiments that have been tried there have encountered sever interference problems.


PROPOSED
ASTROPHYSICAL AREA

MICROWAVE PATHS IN RELATION TO THE PROPOSED MT. GRAHAM ASTROPHYSICAL AREA

SCALE- 1:24000

STEWARD OBSERVATORY
UNIVERSITY OF ARIZONA
TUCSON, ARIZONA 85721

To:	Distribution List
From:	Bobby L. Ulich
Subject:	Electric field strength measurements on Mt. Graham
Date:	August 30, 1985

On August 17-18, 1985, Jim Oty of the National Radio Astronomy Observatory measured the power densities of radio signals at High Peak on Mount Graham. He used 100 kHz bandwidth and covered the frequency range from 50 MHz to 10 GHz. I have converted his data to maximum measured electric field amplitudes in millivolts/meter. Attached are a tabular listing and a plot of the field strengths. The strongest signal is about 11 millivolts/meter at 147 MHz and comes from a repeater on Heliograph Peak about 6 km away. However, other signals at nearby frequencies are nearly as strong and come from off the mountain.

I want to express my thanks to Jim Oty and to others at the NRAO (in particular Peter Napier) for collecting this useful data, which will aid the University of Arizona in establishing an observatory on Mount Graham with some controls over the electromagnetic environment.

Distribution List:

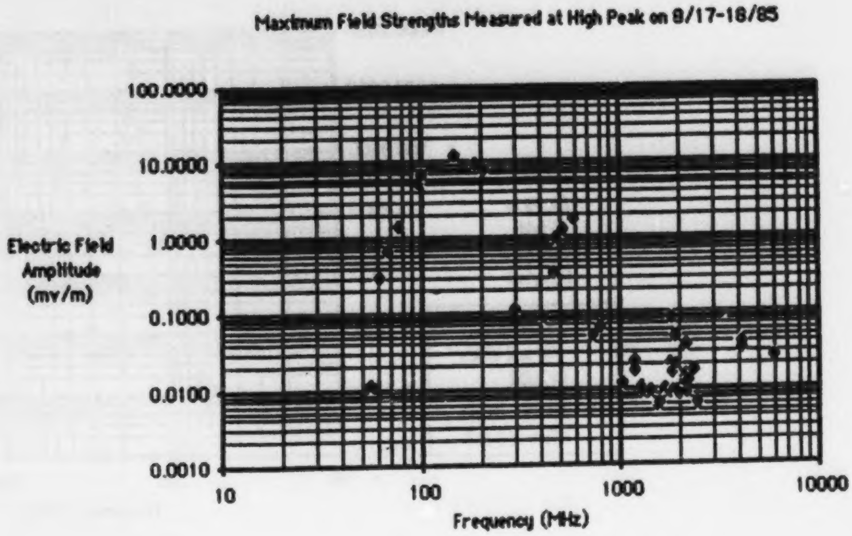
NRAO - Peter Napier, Jim Oty, John Payne, Dewey Ross

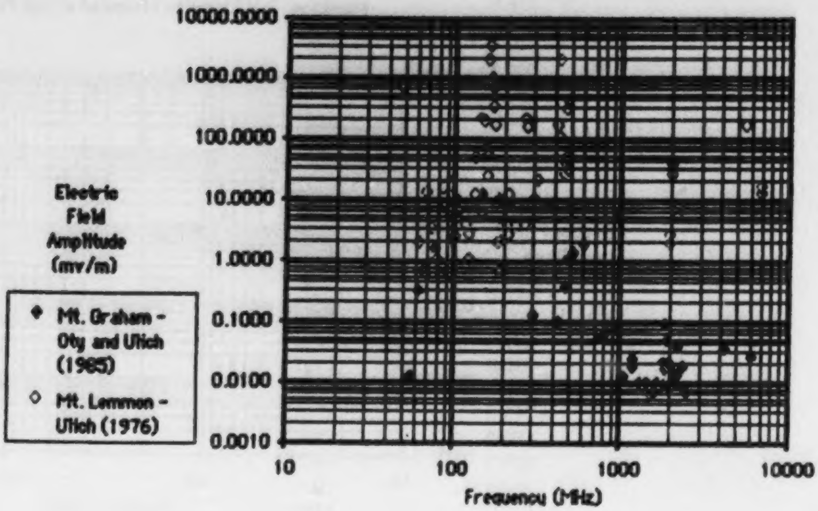
Steward Observatory - Warren Davison, Robert Martin, Maryann McGraw, Doug Officer, John Ratje, Peter Strittmatter, Russ Warner, Paul Welch, MGIO File

MPIfR - Jaap Baars

Field Strengths

Frequency (MHz)	Electric Field (mv/m)
55	0.011
61	0.290
68	0.670
77	1.400
96	5.100
100	6.700
147	11.500
190	9.100
210	7.500
300	0.110
415	0.087
465	0.340
480	0.970
517	1.200
590	1.700
740	0.048
810	0.061
1040	0.011
1189	0.016
1192	0.022
1301	0.010
1321	0.009
1432	0.009
1561	0.006
1605	0.006
1691	0.009
1812	0.020
1821	0.008
1831	0.015
1857	0.062
1867	0.009
1907	0.046
1937	0.019
1947	0.009
1978	0.009
1987	0.008
2150	0.011
2158	0.014
2163	0.036
2171	0.036
2192	0.008
2212	0.012
2343	0.016
2480	0.006
4089	0.038
4150	0.039
4168	0.032
5968	0.025


Maximum Field Strengths Measured at High Peak on 8/17-18/85
Electric Field Amplitude (mv/m)
100.0000
10.0000
1.0000
0.1000
0.0100
0.0010
10
100
1000
10000
Frequency (MHz)


10000.0000
1000.0000
100.0000
10.0000
1.0000
0.1000
0.0100
0.0010
Electric Field Amplitude (mv/m)
◆ Mt. Graham - Oty and Ulich (1985)
◇ Mt. Lemmon - Ulich (1976)
10
100
1000
10000
Frequency (MHz)

Agency response to Steward Observatory

1. Although the Forest Plan and EIS identify potential electronic sites, including West Peak, additional site specific analysis will be required before they could be occupied. The current analysis only identifies them as being suitable for future electronic needs. The additional analysis would determine the extent and type of development that is compatible with other resource uses. We will consider the information you have provided us in the future site planning.

6391 E. Printer Udell
Tucson, AZ 85710

September 9, 1985

0272

Forest Supervisor
Coronado National Forest
300 W. Congress
Tucson, AZ 85701

Dear Sir:

I have carefully reviewed your Summary of the Draft Environmental Impact Statement for the Coronado National Forest Proposed Plan. I believe that Plan B is the best and that it should be followed through the first planning period.

It is obvious that there will be an increasing need for more recreational areas in the near future. The Tucson and Phoenix areas show no signs of slowing growth. To service the needs of those population centers, you must develop suitable areas in all of the forests not just Coronado. Even the areas set aside as preservations need service; facilities need to be developed to handle the large numbers of people visiting them. At the same time, you should encourage mining and forest product harvesting. Such enterprises pay for the development of recreational facilities.

Plan B, although it may cost more to implement, will be the most cost effective and comply most closely with the Forest Service goal of service to the public.

Very truly yours,

A. [illegible] Stringham

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

SEP 11 1985

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Agency response to
J. R. Stringham

Although we agree with your assessment of increasing recreation demands near Phoenix and Tucson, it would be unwise for us to base our Forest Plans on being able to satisfy the total demand. Hopefully, by working with local, State, other federal agencies, and private enterprises, we can together meet the publics needs.

Alternative B has an emphasis directed towards producing market outputs (e.g., timber, grazing, and developed recreation). This emphasis does not provide a higher level than the Proposed Action of total net public benefits when considering both priced and nonpriced outputs.

We agree that Alternative B does have a much higher cost of implementation ($6,631 dollars more). The selection of an alternative must consider the viability of obtaining the needed funding to implement it. The Proposed Action was developed based on our realistic expectation of future budgets.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

AUG 23 1985

RECEIVED

JOHN S. SUMNER

0187

428 N. Sawtelle
Tucson, AZ 85716

August 21, 1985

Dear Sir:

Thank you for the Overview of the Coronado Forest Proposed Plan. It looks like a rather thorough review has been made.

1 However, I would like to see more wilderness, roadless areas, and forest in the Galiuro Mountain area. I have property near there., and see the real need for more conservation.

2 At the present time the Mt. Graham astrophysical observatory near Safford appears to be justified, but I would like to receive the Mt. Graham EIS. My property is in full view of this site, and I would like to be informed.

Thanks again for your consideration.

Sincerely,

John S. Sumner

3 P.S. Your vicinity map on the inside cover of the "Summar of the Draft - - -" is a bit confusing because Safford is indicated to be west of Mt Graham rather than to the east. J.S.S.

Agency response to John S. Sumner

1. The 1984 Arizona Wilderness Act added 23,600 acres to the Galiuro Wilderness Area. The total area in wilderness is now 76,317 acres. As a result of this same Act, additional roadless areas in the Galiuro Mountains were not evaluated at this time for wilderness suitability. When the Forest Plan is redone in the next ten to fifteen years, roadless areas will be revaluated for inclusion in the wilderness system.

2. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as it was for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

3. The word "Safford" was intended to indicate the Safford Ranger District of the Coronado National Forest and not the specific location of the town of Safford.

CORONADO N. F.
OCT 0 '85

Forest Supervisor
Coronado National Forest
Tucson, AZ 857[illegible]

October 7, 1985

0613

Dear Sir:

This letter is to comment on the Coronado National Forest Proposed Plan. It would be simplest if I completely agreed with one of the six alternatives offered, but I find my opinion varies from one issue to another. I therefore will list the issues of concern to me with comments.

Wilderness: I generally favor careful management that puts a priority on biological diversity rather than economic yield, however I feel that Wilderness designation is some-
1 times too restrictive. I agree with the Proposed Action except that I favor the Mt. Graham Wilderness.

Wildlife and Fish: I favor Alternative D.

Range: I strongly oppose Alt. B which would be both expensive and potentially harmful. I oppose vegetative manipulation by aerial spraying in all cases, and bulldozing and chaining in most cases. I stongly favor range improvement where no action will allow a worsening of range condition, but am opposed to changing stable plant communities simply
2 to increase forage for livestock. Bringing stocking rate into accordance with carrying capacity should be accomplished as quickly as possible.

Timber: Again I strongly oppose Alt. B in which timber stands would be converted to fprage. The potential for disastrous erosion and invasion of noxious plants, and loss of biological diversity, is great. The Forest Service should not be engaged in wholesale destruction of plant communities, or tree farming, or conversion of forest to rangeland. I favor the Proposed Action.

3 Fuelwood: I oppose the Propsed Action, which requires construction of new roads for access to fuelwood. I would favor permitting commercial packers to operate under FS supervision packing wood cut by the public to the nearest existing road access.

4 Riparian areas: I prefer limiting grazing to protect vegetation, especially cottonwood, sycamore, alder, but would favor carefully-managed short term grazing to reduce fire danger from dried grass.

5 Watershed conditions: I place a high priority on reclamation of unsatisfactory watershed conditions, through gully control, reseeding, waterspreading etc, but I oppose large scale vegetative manipulation as proposed in Alt. B.

Minerals: My concerns are for minimizing surface disturbance, minimizing eyesores and noise, and for strong requirements
6 for surface reclamation. I generally oppose road construction to mining claims. The FS should ensure that assessment work required by the mining laws does not result in damage to

6 the surface, as is often the case now.

7 Mt. Graham Observatory: I oppose the use of more than one peak. If it is approved, great care should be taken to minimize its impact on the mountain. I oppose the construction of a tramway. Helicopter traffic to the observatory should be strictly regulated and minimized. They should be encouraged to build the damn thing elsewhere or not at all.

Research areas: I support Alt. D. Research areas are of relatively small area and therefore their opportunity cost is very low, while the potential gains from them are high.

Fire Management: I support the new philosophy of fire management in most cases.

8 Roads: I generally oppose the construction of new roads. I favor investing money that would have been used in building a new road into maintaining existing roads to minimize soil erosion and to encourage revegetation of abandoned roads. I favor the construction and maintenance of trails, for feet only. I oppose ORVs on trails. They should be allowed in restricted areas only (preferably off the Forest).

9 The Forest Service should eliminate the billboards they erect along Forest roads (No Littering, Smokey Says, Woodsy Owl, Green Forests Offer More and other such inanities). The FS should not be in the propaganda business. Put your time and money into reclaiming damaged land, managing resources and maintaining trails and let people do their own thinking. We go to the Forest partly to escape propaganda.

In conclusion, please be aware that you have been entrusted with the cream of southern Arizona land. The decisions you make affect the lives of hundreds of thousands of plants and animals, all of which have a right to live and deserve our respect. Your job is to manage human use to avoid damage, not to maximize profit. When in doubt, leave it natural. Thank you.

Peter Sundt

Peter Sundt
Box 12
Klondyke, AZ 85643

Agency response to Peter Sundt

1. The Forest Plan has been revised to recommend wilderness designation for the entire (62,000 acres) Mt. Graham Wilderness Study Area. Our analysis and public comment now indicates there are no conflicts with this designation and future management of the Proposed Mt. Graham Astrophysical Area, whether it be development or no development.

2. The Forest Plan would bring livestock grazing use in balance with capacity during the second decade.

3. Fuelwood harvest is an activity used to achieve other resource objectives. In order to manage the stands to meet these objectives, such as meeting wildlife habitat needs, adequate access is needed. Although we utilize your suggestion of packing wood on occasions, it does have practical limitations. These access roads often provide other recreation opportunities for the public. New road construction is projected to be less than ten miles during the plan period.

4. In the Southwest, the Forest Service has a general policy that riparian areas will be managed for "riparian dependent species." The Southwestern Regional Guide gives definitions and standards for riparian inventory and management. The Forest Plan reinforces this direction and provides additional specific standards and guidelines to implement the direction. See Management Area 7.

   This Plan will not call for automatic exclusion of grazing from all riparian areas. Most can be managed through range management practices to preserve these unique values. A classic example of this can be seen in the nationally known Cave Creek Riparian Area, which is grazed every fall. Many other riparian areas on the Coronado exhibit proper grazing management. Total exclusion of livestock from these areas is impractical and often unnecessary.

   We, on the Coronado, have long recognized that certain key riparian areas will require complete exclusion of livestock. Many such areas have been fenced off and we continue to do so. At least two such areas will be fenced this fiscal year.

5. The proposed action places high priority on protection and rehabilitation of watersheds.

6. Development of mineral resources is a legitimate use of the National Forests along with other resource uses. Mining and leasing activities will be allowed within the framework of applicable laws and regulations including environmental laws and regulations designed to mitigate the impacts of mining activities.

7. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

8. Very few new roads are planned for the Coronado National Forest. Some low standard roads may be necessary to meet the various resource objectives. They may be temporary or permanent depending on future needs for total resource management. The priority will be on maintenance and reconstruction of existing roads.

   Under the Forest Plan, motor vehicle use will be restricted to existing roads and trails. The question of their use on specific roads or trails will be addressed as the Plan is implemented and monitored.

Agency response to
Peter Sundt
(continued)

9. We feel that activities aimed at informing and educating the public are a necessary part of total resource management. The more people we can convince to respect the land and resources, the easier and cheaper our job will be.

JOHN R. SWANSON
P. O. Box 922
Berkeley, CA 94701

Coronado National Forest
TUCSON, ARIZONA
OCT 8 - 1985
RECEIVED

October 2, 1985

Coronado National Forest
300 West Congress
Tucson, Arizona 85701

0689

Dear Sirs;

Please accept my Comments, as follows, concerning —
Draft Environmental Impact Statement – Proposed Plan – Proposed Astrophysical Observatory near Mt. Graham —
Coronado National Forest.

I have been acquainted with this portion of Arizona and New Mexico for several decades; and continue to retain the very firm opinion that this Coronado National Forest contains outstanding Wilderness, wildlife, fish, historic, cultural and scenic resources of certain national significance.

An area that provides a vital and, as all Americans hope, a lasting refuge for man and for all life on this endangered planet. An area, then, that fully benefits man and fully benefits all life, on this damaged Earth.

1 I wish to advise that I am Opposed to this National Forest's Proposed Action – Preferred Plan as such will decimate surface and sub-surface resources and, thus, will Destroy this Coronado National Forest.

2 I, then, strongly recommend that we concerned American citizens we Save this Coronado National Forest by establishing this National Forest as a permanent Dedicated Preserve. With each Unit of the National Forest System established as a permanent Dedicated Preserve. As the purpose of the Forest Service, United States Department of Agriculture, is to Preserve all of the Wilderness, wildlife, fish, historic, all Biological Resources – cultural and scenic resources located on the National Forest System. With each Preserve to protect ecosystems, preserve watersheds, save and enhance all wildlife, fish and botanic habitats – and protect and promote all Biological Resources and their diversity, preserve rivers and streams – creeks, restore – recover all used – damaged areas to their natural environmental condition, and to preserve, protect, strengthen and expand Wilderness as Wilderness is the foundation of all land and water resources.

3 With the purpose of all land and water resources planning and management to preserve, protect, strengthen and expand Wilderness I, then, strongly urge that the following areas – acres located on this Coronado National Forest – only – be fully classified and permanently protected as Wilderness; as each such unit features superb Wilderness attributes, and to be included in our National Wilderness Preservation System – at this time:

- Galiuro Wilderness additions only. 62,487.
- Rincon Mountain Wilderness additions, only. 37,982.
- Pajarita Wilderness additions, only. 9,817.
- Santa Teresa Wilderness additions, only. 1369.
- Mt. Wrightson Wilderness additions, only. 1983.
- Miller Peak Wilderness additions, only. 3712.
- Chiricahua Wilderness additions, only. 2963.
- Pusch Ridge Wilderness additions, only. 3841.
- Bunk Robinson 17886.
- Mt. Graham 6419.
- Whitmire Canyon 13,989.
- Juniper Basin 4722.
- North End 24913.
- Kane Springs 3709.
- Winchester 15,981.
- Dragoon Mountains 34,743.
- Whetstone 39,289.
- Brushy Peak 9375.
- Canelo Hills 9289.
- Tumacacori 34266.

With the following Bureau of Land Management areas to be included in our National Wilderness Preservation System, and with acres, – at this time
▲ Baker Canyon – Guadalupe Canyon 14,397, ▲ Bowie Mountain 6,819, ▲ Galiuro – addition 646, and, ▲ Black Rock 9,117.

● Plus, additional acreage located on this Coronado National Forest to Total 224,000 acres.

● To secure a Grand Total of some 984,000 acres of Wilderness to be located on this Coronado National Forest – only – and to be included in our National Wilderness Preservation System – at this time

4 I wish to advise that I Oppose the proposed observatory near Mt. Graham; as it will destroy important roadless and biological resources.

5 To preserve the water resources of this area.
To classify this National Forest as a National Wildlife Biological Preserve and National Critical Habitat area, so as to Save all life including – and as examples, only – Mexican Wolf, Jaguar, Southern Bald Eagle, Peregrine Falcon, Masked bob-white quail, and Gila Top Minnow.
To establish, then, this Coronado National Forest as a permanent Dedicated National Wilderness Wildlife Biological Preserve and to select the following as this National Forest's permanent planning and management Alternative:
Alternative Preservation Wilderness Wildlife Biological Scenic Resources.

6 To Remove Roads so as to return area to a necessary natural environment.

7 To eliminate minerals, energy resources, and common variety materials activities so as to Save this area's soil and water resources.

8 To permanently Ban all forms of surface and sub-surface activities – developments on all current, proposed and potential Wilderness. With No Release of any Roadless Areas.

9 To acquire all Inholdings on all Public Lands. With No Disposal of any Public Lands.

For when we Save our natural lands and waters; we Save America!

Sincerely,

John R. Swanson

Agency response to John R. Swanson

1. All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

2. The National Forest System is mandated by Congress to develop and administer the renewable surface resources for multiple use and sustained yield of the several products and services obtained therefrom.

   These terms are defined by the Multiple-Use Sustained-Yield Act of 1960 as follows:

   (a) "Multiple use" means the management of all the various renewable surface resources of the National Forests so that they are utilized in the combination that will best meet the needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; that some land will be used for less than all of the resources; and harmonious and coordinated management of the various resources, each with the other, without impairment of the productivity of the land, with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output.

   (b) "Sustained yield of the several products and services" means the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources of the National Forests without impairment of the productivity of the land.

   Therefore, we find it inappropriate to consider the entire Coronado National Forest as a "preserve". We agree the Coronado has special biological, cultural, and scenic resources and these are emphasized where appropriate by the proposed Forest Plan.

3. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

Agency response to John R. Swanson (continued)

Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

Remaining roadless areas on the Coronado National Forest were not considered for wilderness designation as part of this planning cycle. The proposed Forest Plan emphasizes retention of nonmotorized recreation opportunities.

Agency response to
John R. Swanson
(continued)

Due to this emphasis and the limited level of development planned, these areas should remain essentially roadless and can be studied for wilderness suitability in the future.

4. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will last at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

5. We are unfamiliar with the special area designations you mention or the authorities under which they can be made. There are two special area designations pertaining to National Forest System lands that can be made under authority of the Code of Federal Regulations. These are Research Natural Areas and Natural History Areas. Both of these designations were considered for appropriate lands of the Coronado National Forest.

Research natural areas (RNAs) are established under 36 CFR 251.23 to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually preclude or severely restrict most resource uses, including recreational activities.

We have carefully reviewed all proposed Research Natural Areas and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out each special area. We recognize that the entire National Forest is a unique place and worthy of special care.

It is important to bear in mind that the RNA program is national in scope and not limited to National Forest lands. It is not necessary or even desirable to have every vegetative type within the Coronado N.F. represented by RNAs on this Forest. Better representatives may well exist elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

The Forest Service has been given the authority to establish special recreation areas in the Code of Federal Regulations, Section 294.1. While special areas may be designated for any of a number of special recreation purposes, one important purpose is to provide special management emphasis to outstanding examples of the Nation's natural history values. Such values include outstanding geological formations; significant fossil evidence; relict flora and fauna; scenic grandeur; habitats supporting rare, vanishing, or restricted species; seasonal havens for concentrations of native animals; ecological communities illustrating the process of plant succession; and climax communities. Areas having these natural history values which are of particular importance and clearly merit recognition and special management direction beyond that normally provided through integrated resource planning are considered for designation as a special area.

There are five types of special area designations. Scenic areas are places of outstanding or matchless beauty which require special management to preserve these qualities. Geological areas are areas with outstanding formations of unique geological features of the earth's development including caves and fossils. Botanical areas are areas containing specimens of group exhibits of plants, plant groups, and plant communities which are

Agency response to
John R. Swanson
(continued)

significant because of form, color, occurrences, habitat, location, life history, arrangement, ecology, environment, or rarity. A zoological area contains authentic, significant and interesting evidence of our American National heritage as it pertains to fauna. Paleontological areas contain relict specimens of fauna and flora.

Zoological and/or Botanical Areas have been proposed for areas where truly unique biological resources are in need of special management emphasis to accommodate public use and enjoyment of them. Most of the Coronado is biologically unique and our overall management emphasis is aimed at preservation of these qualities of the land. The ZBA designation has been reserved for those special areas where more than ordinary management emphasis is required. Such areas are identified in the plan, and others were considered as suggested by various respondents.

6. The current transportation system is considered to be adequate for most anticipated uses. New road construction will be based on needs to meet specific resource management objectives. The Forest Plan predicts this need will be limited to low standard roads for wood harvest and mining activities. Approximately ten miles will be needed for wood harvest. We are unable to predict the need for mining but expect it to be minimal. Once a road is no longer needed for resource use or management, our intent is to close it either temporarily or permanently. Road management emphasis will be on maintenance and reconstruction of existing roads.

7. Forest Service policy toward mineral activity on National Forest System lands is implicit in law.

All minerals on the public land, except those specifically subjected to other disposal by Congress, are subject to appropriation by the location of mining claims. The 1872 Mining Law was a grant by Congress of the right for individuals to go on the vacant, unappropriated public land to search for, disclose, appropriate, produce, and process the minerals. It was a grant also of the right to use surface and surface resources necessary to those operations and of reasonable access to them. The grant is limited only in that unnecessary or unreasonable activities are not authorized.

Sales of common materials are made under the authority of the Materials Act of 1947, as amended (Material Act). Leases are made under the authority of the Mineral Leasing Act of 1920, the Leasing Act for Acquired Lands of 1947, the President's Reorganization Plan No. 3 of 1946, the Geothermal Steam Act of 1970, and the Coal Leasing Amendments Act of 1975 (Leasing Laws), most of which have been amended one or more times.

Three other laws have major relevance to the Forest Service function relative to minerals and the effects of mineral activity. The Mining and Mineral Policy Act of 1970 (MMPA) provides a National policy which must guide the Forest Service. The Federal Land Policy and Management Act of 1976 (FLPMA) provides for an information base for locations under the 1872 Act and defines the basis for removing Federal land from mineral activity. The Wilderness Act of 1964 limits the application of the Mining Law and the Leasing Laws, and in certain situations reduces the rights accorded to those operating under the Mining Law.

Minerals are fundamental to the Nation's well-being. The National Forest System by coincidence of geology and geography is a principal storehouse of minerals and energy. The search for an removal of minerals and energy resources are authorized uses of the National Forest System, to be encouraged and facilitated in accordance with the National Mining and Mineral Policy Act of 1970 and conducted in the public interest.

The Forest Service objective is to carry out the mineral management mission in a fair and timely manner, consistent with multiple-use management principles, to integrate the exploration, development, and removal of mineral and energy resources with the use and conservation of other re-

Agency response to
John R. Swanson
(continued)

sources. The Forest Service will, through appropriate regulations and plans of operation, seek to minimize adverse impacts to other resources while fulfilling our mandate to foster mineral development.

8. See response numbers 2 and 3.

9. The Coronado National Forest Plan identifies private lands within the National Forest boundaries that are thought to be suitable for management as public lands. In addition, it also identifies public lands that would be more suitable in other ownership.

October 9, 1985

0636

Forest Supervisor
Coronado National Forest
300 West Congress
Tucson, Arizona 85701

CORONADO N. F.
OCT 11 '85

Dear Mr. R. B. Tippeconnic;

General comment concerning the Coronado National Forest Plan

I feel, as many others do, that wildlife and plant resources are the greatest value of the Coronado National Forest and surrounding areas.

The following are some specific comments I have on various aspects of the Coronado National Forest Plan.

Wilderness

1 I'm not familiar with all the Forest Service and BLM Wilderness Study Areas in southeastern Arizona, nevertheless, I'm in favor of Wilderness designation for all seven areas, which include some 106 thousand acres, if they meet the criteria for such designation.

Wildlife and Fish

2 The high level effort proposed by Alternatives C, D and E is necessary for the protection of the numerous Threatened and Endangered Species as well as various unique species found in the Coronado National Forest.

Range Capacity vs Livestock Numbers

3 Having 16% of the suitable and available range in unsatisfactory condition doesn't seem bad, but it still needs appropriate and prompt action to bring permitted livestock numbers in line with range capacity. My suggestion is to reduce permitted livestock numbers in unsatisfactory areas immediately - then as the range capacity improves increase the permitted numbers of livestock.

Livestock - Wildlife Conflict

4 Every effort should be made to ~~eliminate~~ eliminate livestock - wildlife conflicts in the shortest time possible. With livestock reductions in certain areas in conjunction with improved range management - why couldn't livestock - wildlife conflicts be eliminated within ten years or less?

Additional Roads for Fuelwood Harvest

5 It is not acceptable to me to build additional roads to access new areas for fuelwood harvest.

Riparian Areas

6 Fifty years is just too long a time in order to bring riparian areas to a satisfactory level. I'm not sure just how feasible it is, but if livestock use in riparian areas with perennial water could be eliminated - this would go a long way in rapidly improving those areas.

Watershed Conditions

7 It's imperative that all watershed acreage achieve a satisfactory standard in far less than the 40 to 50 years proposed by the Coronado National Forest Plan.

With 31% of the Cornado N.F. watershed acreage in unsatisfactory condition, it's necessary to balance permitted livestock use with range capacity - now!

Mt. Graham Astrophysical Proposal

8 I'm not certain concerning the proposed astro-physical use of Mt. Graham. I am certain that disruption of bear hibernation and spotted owl nesting should not be a result of the decision.

8 If an astrophysical facility is built on Mt. Graham, the plan that least impacts wildlife habitats is the one favored by me.

Please send me a copy of the *Mt. Graham Environmental Impact Statement*.

Research Natural Areas

9 The information presented by the EIS and Forest Plan summary is too sketchy. It seems to me that most, if not all, of the proposed changes and new proposals are worthwhile as RNA additions.

If the Mt. Graham Wet Meadows do not represent vegetative types that are targeted for representation by the CNF Plan, in my opinion, they should be.

Zoological - Botanical Areas

10 Again, the information presented in the EIS and NF Plan summary is very sketchy. I'm in favor of alternative D unless it can be shown to me that certain proposed areas do not possess unique biologic values necessary for this designation.

The Coronado National Forest probably contains a greater variety of plant and animal life than any comparable area in the U.S.. Please help to manage this unique area for future generations instead of for the monetary gain of a few.

Thank you,

Bruce K. Thompson

Mr. Bruce K. Thompson
4131 North 23rd Drive
Phoenix, AZ 85015

Agency response to
Bruce K. Thompson

1. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed Threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA.

Agency response to
Bruce K. Thompson
(continued)

2. As you suggest, Alternatives C, D, and E have a strong emphasis on the recovery of Threatened and Endangered species and management of habitat of other unique animals. The Forest Proposed Plan also calls for a significant effort in this area. Wildlife habitat has long been a primary concern of the Agency. All projects and plans are closely coordinated with wildlife needs and in consultation with the involved State wildlife agencies. The Coronado Plan devotes a great deal of effort to plans to preserve or enhance excellent wildlife habitat of the area. A source of pride is the strong consideration for nongame and endangered species.

3. We agree that it will be necessary to temporarily reduce grazing, while measures to improve the land's capacity are undertaken. This is the reason that the Forest Plan predicts a reduction from the present 400,000 AUMs to 350,000 in the first period and 338,000 in the second period. As the range responds to improved range management, coupled with decreased numbers, use will be allowed to follow the rising capacity. It is anticipated that long term productivity will be at about 360,000 AUMs, about ten percent less than present.

4. Standard Forest Service grazing capacity estimation techniques already allow for forage allocation to wildlife species present on the range. In cases where livestock use is depressing wildlife populations, additional forage is allocated to wild animals. Actual dietary overlap between cattle and most wildlife species in Arizona is far from total. For example, in many cases, use of a range by cattle actually enhances production of forage for deer and other browsers through increased availability and productivity of shrubs. Given the rate of resolution of the remaining overgrazing problems, we believe any existing livestock-wildlife conflicts will be eliminated in ten years or less.

5. Fuelwood harvest on the Coronado National Forest is an activity used to meet other resource objectives such as providing recreational opportunities and providing wildlife habitat. Some access roads are necessary to manage the stands to meet these resource objectives. Only ten miles of roads are planned during the Plan period.

6. The lag between balancing grazing use and capacity and the time when 100 percent of the riparian area will be in satisfactory condition is due to the time needed for woody riparian vegetation to recover.

   A riparian area is considered satisfactory when at least 60 percent of the woody plants are in three or more species; three age classes are represented with at least 10 percent in sprouts and seedlings; and at least 60 percent of natural cover is maintained. Since riparian areas that are now unsatisfactory usually are lacking the young age classes of woody vegetation, it will take about 30 years to establish the two younger age classes once grazing is controlled.

   The Forest Plan prescribes that at least 25 percent of the riparian area will be in satisfactory condition by the end of the second period and that the percentage in satisfactory condition will increase each year. The statement that 100 percent will be satisfactory by the end of Period 5 does not mean we will wait until then to make improvements.

7. The simple removal of livestock to achieve balance with capacity will not bring about immediate improvement in watershed condition. The Proposed Action uses management practices, including range improvement, designed to reestablish effective ground cover and bring about improvement in overall watershed condition with all watersheds in satisfactory condition by the end of Period 5. Long-term productivity of all related resources is protected. This improvement is ongoing and does not mean no watersheds will improve before 50 years.

Agency response to
Bruce K. Thompson
(continued)

8. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

9. We agree that identification and designation of appropriate RNAs is important and believe the Coronado N.F. can be justifiably proud of leading the Southwestern Region in that effort. We have more RNAs than any other Forest and with our proposed additions, will have represented all targeted types for this Forest.

Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually precludes or severely restricts most resource uses, including recreational activities.

We have carefully reviewed all proposed Research Natural Areas and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out such special areas. We recognize that the entire National Forest is a unique place and worthy of special care.

It is important to bear in mind that the RNA program is National in scope and not limited to National Forest lands. It is not necessary or even desirable to have every vegetative type within the Coronado N.F. represented by RNAs on this Forest. Better representatives may well exist elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

The desirability of establishing an RNA or ZBA (wet meadows and/or spruce-fir) near the summit of Mt. Graham, within the proposed astrophysical development area will be addressed in the EIS now being prepared to evaluate the observatory proposal.

10. The Forest Service has been given the authority to establish special recreation areas in the Code of Federal Regulations, Section 294.1. While special areas may be designated for any of a number of special recreation purposes, one important purpose is to provide special management emphasis to outstanding examples of the Nation's natural history values. Such values include outstanding geological formations; significant fossil evidence; relict flora and fauna; scenic grandeur; habitats supporting rare, vanishing, or restricted species; seasonal havens for concentrations of native animals; ecological communities illustrating the process of plant succession; and climax communities. Areas having these natural history values which are of particular importance and clearly merit recognition and special management direction beyond that normally provided through integrated resource planning are considered for designation as a special area.

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Agency response to
Bruce K. Thompson
(continued)

significant because of form, color, occurrences, habitat, location, life history, arrangement, ecology, environment, or rarity. A zoological area contains authentic, significant and interesting evidence of our American National heritage as it pertains to fauna. Paleontological areas contain relict specimens of fauna and flora.

Zoological and/or Botanical Areas have been proposed for areas where truly unique biological resources are in need of special management emphasis to accommodate public use and enjoyment of them. Most of the Coronado is biologically unique and our overall management emphasis is aimed at preservation of these qualities of the land. The ZBA designation has been reserved for those special areas where more than ordinary management emphasis is required. Such areas are identified in the plan, and others were considered as suggested by various respondents.

0683

October 5, 1985

Forest Supervisor, Coronado National National Forest
300 West Congress
Tucson, AZ 85701

Dear Sir:

My friends and I strongly believe that the first duty of a national (r state forest and similar parks) is to protect our environmen t, wild- life and all plants which so often need protection from man and his greed. PA sp nds good but Alternative D sounds the most promising.

ORVs have caused great environmental DAMAGE EVEN HERE IN MICHIGAN and harmed wildlife, even other people and I know from friends that this damage is even more severe in California, Arizona etc. Ranchers have often caused erosion and other environmental damage, especially to stream banks by overgrasing and by carelessness in not controlling livestock and grazing. Roads and make fire damage more likelytp happen and worse, they can also lessen the chances for wilderness desig- nation, While I realize the need for jobs the timber industry and other timber users can cause great damage by cutting Un steep clopes. extensive clearcuts, etc.

Yours truly,

Ethel W Thornley
and many friend
[illegible] of [illegible]
and other

(Ms) Ethel W Thorniley
18653 Schoenherr
Detroit, MI 48205

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 8 - 1985
RECEIVED

Agency response to
Ethel W. Thorniley

All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

0686

Tucson Rod and Gun Club

P.O. BOX 12921 TUCSON, ARIZONA 85732

Tucson, Arizona.
October 7, 1985.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 8 - 1985
RECEIVED

Mr. R.B. Tippeconnic
Forest Supervisor
300 West Congress Street
Tucson, Arizona. 85701

Reference: Draft Environmental Impact Statement,
Proposed Coronado National Forest Plan.

Dear Mr. Tippeconnic,

I am writing on behalf of the Board of Directors, and the 3,600 members of the Tucson Rod and Gun Club.

Our primary considerations are: What is best for the Coronado National Forest, what is best for the wildlife and the habitat, what is best for the people who hunt and fish, what is best for the taxpayers, and very important to all of us, access to Forest Service Lands.

We believe that at this time, there should be no exchange of land between the Bureau of Land Management, and the Forest Service. It is our belief that the BLM and the Forest Service should be consolidated for a more efficient method of managing Public Lands. This would provide an effective method of reducing operating costs. In the cases where fewer employees would be needed, their numbers could be reduced over a period of time by attrition. We feel that all employees should be treated fairly, and layoffs excluded.

The multiple use concept under which the Coronado National Forest has been operating, is the most practical and beneficial method of operation.

1 Special Use Permits, for whatever purpose, should be evaluated very carefully on an individual basis. Prior to decision making, there should be ample time for public input. Public input should be given an important part in any decisions concerning use of Forest Service Lands.

2 Legal public access should be guaranteed in all cases so that the public could have use of the lands that belong to all of us. In areas where access has been restricted by development of private lands, routes of access to Forest Service Lands should be obtained and made available to all.

3 Our renewable resources should be managed so that they are not decimated, and could renew themselves. Cutting of timber should be controlled on a contract basis, and managed so that forests are not decimated, causing erosion, ruining wildlife habitat, and

Page -2-

Mr. R.B. Tippeconnic
Forest Supervisor
300 West Congress St.
Tucson, Arizona. 85701

3 causing damage to the aquifer recharging system. Firewood gathering could continue on a permit basis, controlled and supervised by specialists in forest management.

4 Grazing of livestock for commercial purposes should be regulated to the level that the area in it's natural state could support. The natural habitat in these areas that support wildlife in addition to livestock grazing, should be given serious consideration. In many cases, livestock and wildlife use the same forage and eat the same plants.

5 We thank you for your consideration of our views with regard to planning for use of our Coronado National Forest in the future. Our club has been vitally interested in conservation and use of the Coronado National Forest for over fifty years. If there is anything that we can do to further assist you, please let us know.

Respectfully yours,
Dick Scott
Dick Scott
Chairman Legislative Committee.

Agency response to Tucson Rod and Gun Club.

1. Any time the Forest Service receives a proposal for any use of the Forest or a change in an existing use, it must be subjected to an environmental analysis. Part of this analysis involves appropriate public involvement, including ample time to become involved. Proposals must be considered in relation to other uses and activities on the National Forest. Decisions resulting from the analysis are used to amend or revise the Forest Plan.

2. The Forest Plan identifies legal public access as one of the most important issues or concerns facing the Coronado National Forest. Although progress has been made in past years, much work remains to be done. See schedule for needed rights-of-way on page 29 of the Draft Forest Plan. Future progress will only be as fast as cooperation with others and funding permits. Since you have offered your help, this might be one area where your organization could provide valuable assistance to the Forest.

3. All timber and fuelwood harvest is done under contract or permit. Sale preparation and administration is provided by trained resource specialists. The primary purpose of wood harvest on the Coronado N.F. is to enhance other resource values such as recreation and wildlife. Harvest levels are not allowed to exceed sustained yield.

4. The natural or biological capability of any area of land to produce forage is the primary consideration when allocating forage to livestock. Another consideration is the forage and cover needs for resident wildlife species. While livestock and wildlife occasionally utilize the same plants, we cannot agree there is a direct correlation between numbers of livestock and capacity for wildlife. Actual dietary overlap between cattle and most wildlife species in Arizona is far from total. In many cases use of a range by cattle actually enhances production of forage for deer and other browsers through increased availability and productivity of shrubs. Many forage species in Southern Arizona can sustain use levels of 35 to 50 percent without physiological damage if given adequate rest following grazing. Vegetation manipulation practices on the Coronado are used to maintain the natural condition of the land in order to sustain the natural capability to produce forage for both wildlife and livestock.

5. Thank you for your past and future assistance in management of the Coronado National Forest.

0699

CORONADO N.F.
OCT 10 '85

Tucson, Arizona
October 8, 1985

Forest Supervisor
Coronado National Forest
300 West Congress
Tucson, Arizona 85701

Dear Sir,

Tucson Rough Riders, Inc. is a recreational oriented, family, four-wheel drive organization that was incorporated in 1976. Our activities consist of organized trips and events which frequently involve the responsible use of public lands and roadways within the Coronado National Forest.

We have reviewed the Recreational alternatives proposed in the Coronado National Forest plan and wish to go on record as vehemently opposing the Proposed Action which would either close or restrict 100% of the Forest from motor vehicle use except on designated roads and trails.

Although we object to any additional closure of public lands, alternative B, which would leave 72% of the Forest open to vehicle use, is in our opinion, the best available option for our interests.

Sincerely,

Tucson Rough Riders, Inc.

Arlo Englund
James C. Robson
Henry E Wilde
Ron Diegert
Lucy Vinz
L.A. Barr Jr.
Robert A Marshall
Rudy Schultz
Ray Mason
Amy Richards
James P Richards JR
Diane P. Robinson
John Vary
Donald J. Apnut
Steve Bateson
Bob Hofacker
Fred A. Espinoza
Jim W Whittaker
Juan Hernandez
Dave Jameson
Walter W Wright

T. Sue Barr
Stu Benson
S.D. Jacobson
Wendie Benson
Ineda J. Croy
Well Weyms
Susan Fry
Bevo Fry
Nona Herbert

Agency response to Tucson Rough Riders, Inc.

We acknowledge the position of the Tucson Rough Riders, Inc. in regard to the vehicle management policy proposed in the Forest Plan. We also recognize that members of the group engage in responsible use of public lands including the Coronado National Forest. For these reasons we would like to briefly explain our position to insure there is no misunderstanding regarding the intent of the proposed policy.

The purpose of the planned policy is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit. Based on past conversations with members of four-wheel drive organizations, we believe most members agree with this concept.

The policy is not an attempt to "ban" ORV's or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

The Forest Plan makes no recommendations for closing any specific roads to vehicular use. This means there would be over 2800 miles of roads within the Coronado National Forest open to motor vehicle use. Many of these existing roads are primitive, four-wheel drive type roads. Before any roads are closed, a site specific environmental analysis will be conducted. This analysis includes contacting potentially affected users to determine existing and future use requirements.

Signing or designation of roads open to vehicular use would be by route markers. The intent of this is to use a signing system already established for the purpose of informing the public where they are traveling and which roads are being maintained as part of the National Forest transportation system. Route markers now exist on many roads throughout Arizona and New Mexico National Forests. We recognize there is much work yet to be done to sign all roads. For this reason, total implementation of the vehicle use policy will take three to four years for the Coronado N.F. However, by establishing the policy now, we feel current and future resource damage can be reduced because people will know that off-road use of vehicles is not acceptable. Any direct enforcement of the policy will have to be implemented in stages along with the signing.

0610

3357 North Grannen
Tucson, AZ 85745

October 9, 1985

CORONADO N.F.
OCT 10 '85

R.B. Tippeconnic
Forest Supervisor
Coronado National Forest
FB #42
300 West Congress
Tucson, AZ 85701

Dear Mr. Tippeconnic:

I would like to take this opportunity to respond to the Coronado proposed forest plan, as a private citizen.

1 I strongly support Alternative D as presented in the draft document, because this alternative most clearly views and manages the forest with a rational long-term approach towards resource conservation and meeting the needs of all the American people for a long time to come. I fear that the Proposed Action is too short-sighted and emphasizes the needs and desires of the small number of ranchers far too much.

2 I particularly would like to urge the establishment of Wilderness Areas in the Bunk Robinson and Whitmire Canyon WSA's, maximize the area of the proposed Mt. Graham Wilderness.

3 The question of the proposed Mt. Graham Observatory is very complex, and I look forward to reading the detailed EIS currently in preparation. While I would prefer to see no development whatsoever on the top of Mt. Graham, I also understand that an astrophysical observatory would be far less damaging and therefore more acceptable than, say, a ski resort. Furthermore, I believe that if the observatory is very carefully planned and operated, its direct environmental consequences may be quite minor. The indirect consequences, on the other hand, strike me as potential environmental disasters. The two indirect consequences that cause me the most worry are increased tourist traffic up the mountain to visit the observatory, and the effects of winter vehicular access to the top of the mountain.

If an observatory must be built, tourist traffic should be discouraged by prohibiting access to the site itself and building a visitor center (if necessary) in the town of Safford. Winter access up the mountain should be restricted to an absolute minimum required for observatory operations.

I commend your office for including the "Citizen's Alternative D" in the draft documents.

Sincerely,

Jake Turin

Jake Turin

Agency response to Jake Turin

1. All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C, project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

2. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

   Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

   The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

   The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

   Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness

Agency response to
Jake Turin
(continued)

experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

3. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will be at least ninety days as for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

0700

UNITED FOUR WHEEL
DRIVE ASSOCIATIONS
of U.S. and CANADA
8900 N. Camino de Anza Tucson, AZ 85704

CORONADO N. F.
OCT 10 '85

Action X		Action X		Action X		Action X	
Info ✓	Init	Info ✓	Init	Info ✓	Init	Info ✓	Init
FS		RES		LA		O	
LMP		B&F		ARCH		M	
AQ		PER		WL		SV	
ENGR		AS		WS		S	
RGE		CS		SLS		SC	
RLT		LX		DISP		NARTC	
FIRE		RECP		PIO/IS		COMM	

Mr. R.B. Tippeconnic, Forest Supervisor
Coronado National Forest - USDA
300 W. Congress
Tucson, AZ 85701

Oct. 5, 1985

Dear Mr. Tippeconnic:

I would like to submit these comments regarding your proposed "forest management plan". I would prefer to support your "alternative B" rather than the "preferred alternative" you have listed. Plan B is the one management alternative that meets or exceeds the projected future needs of the Coronado , and has the greatest amount of revenue return to the U.S. treasury. Also, in regards to "vehicular recreation" Plan B is the least restrictive and goes the furthest to limit "wilderness". I realise that Plan B is the "most" expensive, but in those terms you can "pay now" or pay more "later" to meet demands.

The aspects of your "preferred alternative" I object to the most refer to your ORV management "restrictions". You have exceeded the realities of management. The "Restricted" classification is too great, and too restrictive. This restriction unduly penalises too many citizens. Your proposed management of this classification would be to "close" all roads unless specifically posted open. How can you physically hope to "post" ALL the roads you want "open"? You state that only 22% of the Coronado will be "closed" to vehicular recreation. Yet by adding up your existing wilderness, proposed wilderness, "unique resource" areas, "research natural areas", "primitive recreation areas", zoological, botanical, etc. areas I come up with 26-30% of the Coronado N.F. that will be "closed" to any and all vehicular uses.

The basic conflict with vehicular recreation is one of perception. Perceptions of "other" recreation users. Here the perception is that ALL ORV use is x-country motocrosses with dirt bikes. Most of your actual resource management problems of ORV recreation centers on ATC's and dirt bikes. For the most part recreational 4-wheelers stay on existing 4WD trails. The problem with resource damage is not one of banning ORV's, it is one of adequate supervision, enforcement of existing regulations, and professional management. Simply "closing" the forest is not the answer. This can be likened to "closing" the interstates because some people drive more than the posted speed limit of 55 MPH.

Your own report states that "ORV recreation is in great demand and increasing" (actually it is a part of the entire dispersed recreation demand), and that "access is limited" for recreation users. You go on to state that "addition of new, or more wilderness will not alleviate the problems of existing over-use of some areas and under-utilisation of others". So why then do you continuall stress throughout you draft management plan "non-motorised recreation"? You say in one place that "non-motorized recreation accounts for some 70% (1,750,000 RVD's), yet at another point in your plan you list the statistic that wilderness accounts for only 758,000 RVD's, and projected demand for non-wilderness recreation will be 2,237,000 RVD's". It sounds like you're trying to stack the deck. Throughout your draft plan you refer to "closing roads, restricting vehicular uses, and increasing non-motorised recreational opportunities".

Actually vehicular recreational use of the Coronado NF should be limited to "existing, established" roads and trails. This would be rather simple to manage and any severe resource damage or user conflicts could be adequately accomdated through seasonal closures, limiting use through permits, and other management alternatives. Simple "closing" of the Forest, or severe restriction and limitation WILL NOT solve the problem. It is the "outlaw" who presently disregards existing regulations and causes the problem. Banning ALL vehicular recreationists will not stop this "outlaw". He will break through the gate and still cause the damage. This approach will only infringe upon the rights of legitimate vehicular recreationists. Also by severely limiting recreational opportunities only forces these recreationist to find a place to enjoy their ORV's that will be harder to regulate and manage. You really don't solve the ORV problem you compound it. Recreational 4-wheeling and other forms of ORV recreation are a popular sport in the U.S. and growing. Actual 4WD sales in the U.S. topped 1.7 million in 1984 and sales of ATV's & other ORV's tops the 3 million mark. These people for the most part are law abiding citizens and do respect the land nature as much as any one. That's why they bought their machines, to get out closer to nature. Just because they prefer a different mode of transportation to reach "pristine, primitive" areas to enjoy "solitude" and a "wilderness experience" doesn't make them any less of a citizen. Recreational 4-wheelers have rights to enjoy the public lands too, without undue restriction and limitation.

Thank you for this opportunity to comment. I hope that together we will be able to work out real solutions to the many problems facing you as a resource management professional.

Sincerely,

Stu Bengson

Stu Bengson
Director, Land-Use
UFWDA

CC: AZ Outdoor Coalition
AZ State Assoc. 4WD Clubs

Agency response to United Four-Wheel Drive Associations

We appreciate the help the Four-Wheel Drive recreation groups have given us in resolving various management problems on the Coronado National Forest. With continuing cooperation we should be able to find solutions to the many challenges now facing us all. We recognize there is a problem of perception with vehicular recreation use and that only a few individuals create and sustain this perception.

You suggest the answer to resource damage is one of adequate supervision, enforcement of existing regulation, and professional management. We agree. However, it is difficult, if not impossible, to supervise, enforce, and manage any activity unless the governing policy or regulation has been clearly established and is known to all concerned.

The purpose of the planned policy is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit. Based on your comments, you seem to agree with this concept.

The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

The Forest Plan makes no recommendation for closing any specific roads. It does suggest that roads not needed for resource use, including vehicular recreational activities, should be closed to provide additional nonmotorized recreation opportunities. The intent of this is to maintain as wide a spectrum of recreational opportunities as possible. Approximately 70 percent of the Forest now provides the opportunity for some form of motorized recreation activity. (See Table 21, page 62, DEIS). Some confusion may exist because of our system of defining motorized vs. nonmotorized activities. Nonmotorized activities (See Table 19, page 60 DEIS) do account for 70 percent of all use, however, most of these activities are the result of access by vehicle. Before any specific roads or trails are closed, a site specific environmental analysis will be conducted. This analysis includes contacting potentially affected users to determine existing and future use requirements.

Signing or designation of roads or trails open to vehicular use would be by route markers. The intent of this is to use a signing system already established for the purpose of informing the public where they are traveling and which roads or trails are being maintained as part of the National Forest transportation system. Route markers now exist on many roads throughout Arizona and New Mexico National Forests. We recognize there is much work yet to be done to sign all roads and trails. For this reason, total implementation of the vehicle use policy will take three to four years for the Coronado N.F. However, by establishing the policy now, we feel current and future resource damage can be reduced because people will know that off the road use of vehicles is not acceptable. Direct enforcement of the policy will have to be implemented in stages along with the signing.

Regardless of a given vehicle management policy, we recognize there will always be some individuals who will disregard established regulations. Teaching responsible use of the National Forests and its resources is something every individual can assist us with.

0668

RECEIVED
B.L.M. AZ STATE OFFICE
SEP 27 1985
PHOENIX, ARIZONA

SEP 27 1985

United States Department of the Interior

BUREAU OF MINES

P. O. BOX 25086
BUILDING 20, DENVER FEDERAL CENTER
DENVER, COLORADO 80225
Intermountain Field Operations Center

September 16, 1985

RECEIVED
TONTO N. F.
OCT 9 1985
ACTION X
INFO V

Memorandum

To: State Director, Arizona, U.S. Bureau of Land Management, 2400 Valley Bank Center, Phoenix, Arizona 85073

From: Chief, Intermountain Field Operations Center

Subject: Review of draft environmental impact statement and proposed forest plan for the Coronado National Forest, Arizona and New Mexico (3 vol., maps) (ER-85/1050)

Bureau of Mines personnel have reviewed the subject reports regarding proposed management of 1.73 million acres of Federal land, and resources in southeastern Arizona and southwestern New Mexico, as requested by Bruce Blanchard, Director, Office of Environmental Project Review. Our comments pertain to management of mineral resources under the plan and focus on the discussion of mineral resources and the assessment of impacts.

The proposed Plan addresses all issues, concerns, and opportunities, within limited budget constraints, to produce a mix of outputs. In this context, we agree with the stated goal for management direction for minerals: "Support environmentally sound energy and minerals development and reclamation." (Plan, p. 24). We believe the intent of the stated goal is lost, however, with the negative form of the minerals issue: "Identification of sensitive areas and formulation of recommendations for needed withdrawals from mineral entry." (Plan, p. 7; DEIS, p. 6). We would rather see this important issue stated in a broader, more positive way, such as: "Identification of areas available for mineral activities, and restrictions necessary to protect other resources." 1

The discussion of mineral resources is unnecessarily brief and fragmented (DEIS, pp. 35, 41, 55, 79-81, 110-113; Plan, pp. 17-18). We believe the sections on mineral resources do not adequately describe the known mineral endowment and substantial potential of the Coronado National Forest. Although tables 4-5, 33-34, and 63-64 (DEIS), and table 5 (Plan) are commendable because they quantify some important data on minerals in the forest, there is virtually no discussion to place these resources in perspective or to show the relation between areas of mineral potential and areas available for mineral activity. Additional supporting discussion and/or maps would greatly improve these sections and allow better assessment of mineral-related impacts in chapter 4 of the DEIS. 2

cc: 10/7/85
Tonto - GL

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 15 1985
RECEIVED

RECEIVED USFS
OCT 03 1985
REGION 3
Lands and Minerals

3

The reports correctly state that a large portion of the forest is at least theoretically favorable for locatable, leasable, and/or salable minerals. Only a few (e.g., oil and gas, copper, gold and silver) are specifically identified; many more commodities could be mentioned, including lead, fluorspar, manganese, molybdenum, tungsten, uranium, and zinc. The acreage data for mineral potential are unchanged from earlier draft reports dated September 1982, and apparently do not reflect studies by the U.S. Geological Survey (USGS) and Bureau of Mines (USBM) of wilderness and adjacent areas in many parts of the forest.

To assist you in the evaluation of impacts on mineral exploration and development, we have listed recent USGS and USBM studies of wilderness areas in the Coronado National Forest. Most of the information also is summarized in USGS Professional Paper 1300. Oil and gas potential of wilderness lands in the forest is shown on USGS Map I-1537. Although several of the areas studied no longer are wilderness or wilderness study areas, the mineral potential evaluations of these areas should be valuable aids in managing the forest.

Bunk Robinson Peak - (USGS Map MF 1425-B)
Chiricahua - (USGS Bulletin 1385-A and Map MF 1385-F)
Dragoon Mountains - (USBM Report MLA 35-82 and USGS Map MF 1521-B)
Galiuro - (USGS Bulletin 1490)
North End - (USBM Report MLA 1-83 and USGS Map MF 1412-D)
Pusch Ridge - (USBM Report MLA 118-82 and USGS Map MF 1356-B, -C)
Rincon - (USGS Bulletin 1500)
Whetstone - (USBM Report MLA 129-82 and USGS Map MF 1614-A)
Whitmire Canyon - (USGS Map MF 1425-B)
Winchester - (USGS Open-File Report 82-1028)

The Bureau of Mines has not studied the Miller Peak, Mt. Wrightson, Pajarita, or Santa Teresa Wilderness areas or the Mt. Graham wilderness study area.

4

Under the proposed plan (DEIS, table 5), about 1.32 million acres or 76.3 percent of the Forest would be available for locatable minerals exploration, and 1.34 million acres or 77.5 percent would be available for mineral leasing. Nearly 340,000 acres of wilderness is unavailable for locatable and leasable minerals development, and an additional 23,000 acres is withdrawn from mineral entry for locatable minerals and restricted for mineral leasing. Mineral activities would be restricted on additional areas, as well. Thus, we feel it is misleading to say (DEIS, table 4, p. 35) that, "Mineral activity will be relatively unaffected regardless of the alternative selected." Although the acreage variation among alternatives is slight, we note that under each, including the proposed plan, mineral exploration and development would be prohibited or restricted for locatable and leasable minerals on more than one-quarter of the Coronado National Forest (DEIS, tables 63-64). The aggregate acreage that would be unavailable, not the slight variation in acreage among alternatives, is a key measure of impact on mineral resources. More important, however, is the relationship—not discussed in the plan or DEIS—between availability and favorability for minerals.

4 Apparently, the only measure used to evaluate mineral-related impacts is the acreage of mineral withdrawals and restricted areas. Mineral potential of withdrawn or restricted areas has not been considered. Yet, the significance of impacts on minerals relates primarily to the availability of those areas having mineral potential. While the withdrawal of an area having no known potential is relatively insignificant, withdrawal of an area known to have moderate or high potential may be very significant.

5 We believe the section on mineral-related impacts (DEIS, pp. 110-113) should describe clearly the availability of the forest for mineral exploration and development. Moreover, it should discuss the significance of overlap between the substantial acreage that is unavailable or restricted and areas having mineral-resource potential. Finally, the acreage restricted under each alternative (DEIs, Tables 63-64) should include remaining wilderness study areas, which must be administered to maintain their wilderness character, regardless of alternative recommendations for forest management (DEIS, p. 67).

William Cochran

cc: Regional Environmental Officers,
San Francisco, CA, & Albuquerque, NM

Agency response to
USDI,
Bureau of Mines

1. At the time the issues, concerns, and opportunities were identified, the only concern related to mineral resource development was to identify areas of the Forest that should be withdrawn from mineral entry to protect other resource values. The wording is not intended to be negative, but only to state the concern as it was presented. We believe the concern is correctly stated. It would be inappropriate to reword it at this time. The other side of the whole issue--identification of areas available for mineral activities--is addressed in the analysis and documentation.

2. You indicate the DEIS did not adequately describe the known mineral endowment or potential of the Coronado National Forest. We have added additional narrative and a table to the Minerals Section, Chapter 3, FEIS, to summarize the local, Regional, and National significance of the Coronado National Forest's mineral resources and mineral potential. In addition, we have revised Table 33, Chapter 3, DEIS, to show the relationship between areas with mineral potential and areas available for mineral activity. Additional narrative has been added to the Minerals Section, Chapter 4, FEIS, discussing the significance of mineral withdrawal impacts of each alternative on mineral exploration and development.

   It should be noted, the EIS only summarizes pertinent information regarding each resource. Other supporting documents, including maps, were used in the total analysis and are available for review.

3. The Bureau of Mines is concerned that the results of various wilderness study area mineral reports were not available for consideration at the time that the mineral potential was being incorporated into the planning process. We have reviewed the reports. The lands identified in those reports as having "substantiated" and "probable" mineral potential do compare, for the most part, with lands of the "demonstrated favorable' and "theoretically favorable" categories in the DEIS. No significant modifications are needed.

4. Please see response number 2.

5. Please see response number 2.

0800

Range
Management

DEC 1 0 1985

CORONADO N. F.

MAR -6 '86

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Ecological Services
2934 W. Fairmount Avenue
Phoenix, Arizona 85017

Action X / Info ✓	Init		Init		Init		Init
FS						O	
LMP							
AO						SV	
ENGR		AS		WS		S	
RGE		CS		SLS		FC	
RLT		LX		DISP		NARIC	
FIRE		RECP		P.G.IS		COMM	

RANGE MANAGEMENT		
Initials Action × Info ✓		
Snyder	✓	
Harrison		
Garcia		
Partido		
Fletcher		
Meir		
Nunez		
Jaramillo		
Gabert		

December 6, 1985

cc: Coronado

Mr. W. R. Snyder
Acting Deputy Regional Forester
U.S. Forest Service, Region 3
517 Gold Avenue, S. W.
Albuquerque, NM 87102

Dear Mr. Snyder:

This is in response to your request of August 30, 1985 for formal Section 7 consultation, as provided for by the Endangered Species Act. The action under consultation concerns the approval and implementation of the Proposed Coronado National Forest Plan (PCNFP) for the Coronado National Forest (CNF) in Cochise, Graham, Pima, Pinal Counties, Arizona and Hidalgo County, New Mexico.

On December 10, 1982, the Forest Service (FS) requested a list of threatened and endangered species that may be affected by the proposed action. The U.S. Fish and Wildlife Service (USFWS) responded to this request on December 15, 1982. The FS requested an updated list on July 19, 1985, and the USFWS responded on August 13, 1985. The FS initiated formal Section 7 consultation on the approval and implementation of the Proposed Coronado National Forest Plan by letter dated August 30, 1985. The USFWS acknowledged the request by letter on September 10, 1985, the date the request was received.

The following listed species were considered in this consultation; peregrine falcon (Falco peregrinus anatum), bald eagle (Haliaeetus leucocephalus), Arizona trout (Salmo apache) and Gila topminnow (Poeciliopsis occidentalis). In addition, the proposed Sonora chub (Gila ditaenia) and Tumamoc globeberry (Tumamoca macdougalii) are addressed.

This biological opinion is based on information contained in the draft Environmental Impact Statement (DEIS), PCNFP, biological assessment of the PCNFP, additional information provided by the FS, biological information from the Arizona Game and Fish Department (AGFD), data in our files and discussions with biologist familiar with the species and the Coronado National Forest (CNF).

Background Information

The intent of the PCNFP is to provide for multiple use and sustained yield of goods and services from the CNF in a way that maximizes long term net public benefits in an environmentally sound manner. To accomplish this, the PCNFP:

Briefly describes the major public issues and management concerns pertinent to the forest;

Briefly summarizes the Analysis of the Management Situation including existing management, projected future use and supply conditions;

Establishes long-range policies, goals, and objectives, and contains the specific management prescriptions planned to meet the policies and to achieve the multiple-use goals and objectives;

Specifies the vicinity, timing standards, and guidelines for proposed management practices;

Establishes monitoring and evaluation requirements needed so that direction is carried out to determine how well outputs and effects were predicted;

Will ordinarily be revised on a 10-year cycle or at least every 15 years.

Forestwide Management Prescriptions for Threatened, Endangered and Unique Species.

1. Maintain occupied habitat of commonly hunted species, listed threatened and endangered species, and management indicator species through mitigation of Forest activities with cooperation of New Mexico Department of Game and Fish (NMDGF), AGFD, and USFWS. Where applicable consult with other wildlife and plant oriented groups and affected agencies.

2. With cooperation of federal, Arizona and New Mexico wildlife agencies, develop overall direction for listed threatened and endangered species. Delist federally and state listed threatened and endangered species in accordance with species recovery plans. Reoccupy historical habitat Forest-wise with other identified species.

3. Reintroduce extirpated native species into historical habitats in accordance with cooperative interagency plans.

4. Consult with the NMDGF, AGFD, and USFWS during the environmental assessment process on projects significantly affecting wildlife and threatened and endangered plant habitats. Where applicable consult with other wildlife and plant oriented groups and affected federal agencies.

5. Determine presence of federally and state listed threatened and endangered plant and animal species in project areas prior to environmental assessment completion. Recommendation for mitigation will be made on a project by project basis.

6. In cooperation with the USFWS, AGFD, and NMDGF develop: (a) general activity plan for state and federally listed threatened and endangered species. This directional plan would guide habitat management on the CNF

by: (1) prioritizing completion of recovery plans on memorandums of understanding by species; and (2) establishing a time frame for (1) above. Habitat requirements, research needs, and transplant goals with completion dates would be outlined for each species within its recovery plan.

7. Develop management plans for designated endangered species critical habitat on site by site basis as species recovery plans are completed.

Forest-wide Management Prescriptions that will benefit Threatened, Endangered, and Unique Species

1. Coordinate where needed, animal damage and plant control on FS administered lands with the USFWS and state wildlife and plant agencies.

2. Maintain current vegetative diversity (numbers of plant associations and species occurrence) by mitigation of CNF activities.

3. In cooperation with Arizona and New Mexico wildlife agencies develop an activity plan for transplanting other native species into historically occupied habitat. This directional plan would guide habitat management on the CNF by: (1) prioritizing relocation sites Forest-wide by species; (2) developing habitat management plans and memorandum of understanding for relocation sites; and (3) establishing a schedule for completion of (1) and (2) above.

4. Timber management priorities are to enhance wildlife and recreation resources.

5. In all aspects of planning watershed will be represented. Plans will be sensitive to maintaining or improving watershed conditions.

6. Manage riparian areas in accordance with legal requirements regarding floodplains, wetlands, wild and scenic rivers, and cultural and other resources. Recognize the importance and distinct values of riparian areas in CNF Plans.

7. Manage riparian areas to protect the productivity and diversity of riparian-dependent resources by requiring actions within or affecting riparian areas to protect and, where applicable, improve dependent resources. Emphasize protection of soil, water, vegetation, and wildlife and fish resources prior to implementing projects.

8. By 1990, complete classifications and inventories of all riparian areas, and complete action plans to improve all unsatisfactory riparian areas. Improve all riparian areas to satisfactory or better condition by the end of Period 5.

9. a. Aquatic resources:

(1) Maintain at least 80 percent of natural shade over water surfaces.

(2) Maintain at least 80 percent of natural bank protection.

(3) Maintain the composition of sand, silt, and clay within 20 percent of natural levels.

b. Vegetation resources (where the site is capable of supporting woody plants):

(1) Maintain at least 60 percent of the woody plant composition in three or more riparian species.

(2) Maintain at least three age classes of riparian woody plants, with at least 10 percent of the woody plant cover in sprouts, seedlings, and saplings of riparian species.

(3) Maintain at least 60 percent of natural shrub and tree crown cover.

c. Wildlife resources: Maintain at least 60 percent of natural shade over land surfaces.

10. On a site-specific basis, identify riparian-dependent resources and develop action plans and programs to bring about conditions essential to supporting those dependent resources.

11. To the extent possible, avoid construction of roads across sensitive soils and scenic lands. Prohibit the construction of roads across mountain meadows.

12. Mining and leasing activities emphasis should be on gaining cooperation and control through the use of operating plans and bonds for rehabilitation to protect and restore surface resources.

13. Utilize prescribed fire in wilderness to enhance wilderness values including restoration and maintenance of threatened species habitat and to permit lightining caused fires to more nearly play their natural ecological role within wilderness. Additional planned ignitions will be used to reduce the risk from wildfire, or its consequences, to life and property within wilderness or to resources, life or property outside wilderness.

Specific Forest Standards and Guidelines

1. Peregrine falcon. Trail construction and maintenance will be prohibited within a one mile buffer around aerie locations and be restricted to a period from October 1 to February 1 (non-breeding season).

All other activities within a one mile radius around the aeries will be observed and controlled to sustain the aeries. Peregrine habitat will be improved, both by prescriptions and by the maintaining of natural conditions in wilderness.

2. Bald eagle. Stock ponds that support waterfowl during the winter months will be maintained and certain ones will be partially fenced to improve waterfowl habitat, therefore, sustaining this food source.

3. Arizona trout. Habitat for this trout will be improved by prescriptions and by the maintaining of natural conditions.

4. Gila topminnow. Habitat for this minnow will be improved by prescriptions and by the maintaining of natural conditions.

5. Sonora chub. Habitat for this chub will be improved by prescriptions and by maintaining of natural conditions. The RNA in which this chub exist is to be enlarged by 1,470 acres.

6. Tumamoc globeberry. Under the PCNFP surveys to locate this plant will continue and fruit will be collected to begin propagation efforts.

Peregrine Falcon

The peregrine falcon on the CNF nests in the tallest and most elevated cliffs, most of which are located in remote ranges and inaccessible areas. Currently there are 7 known productive aeries within the CNF. Three are within a designated wilderness and a fourth is located adjacent to a wilderness area. Two others are found in remote inaccessible areas and one is located next to a riparian area.

Certain activities included in the PCNFP could adversely impact the peregrine. Surface disturbances due to grazing, mining, logging and road building could result in the loss of habitat and prey base. Recreational (hiking and camping) use of breeding areas could disrupt the peregrine's nesting activities. However, implementation of the aforementioned forestwide prescriptions, standards and guidelines, should minimize these impacts.

Bald Eagle

An estimated 5 to 15 eagles winter on the CNF between December and February. Most occur at Parker Canyon Lake, Bog Hole, adjacent stock ponds, and occasionally at Pina Blanca Lake. Eagles roost in these areas and feed at these bodies of water on fish and waterfowl, and on carrion as it occurs nearby.

Recreational activities included in the PCNFP could adversely impact the foraging behavior of these wintering eagles. However, implementation of the aforementioned forestwide prescriptions, standards and guidelines should minimize this impact.

Arizona Trout

The historic range of this trout has been drastically reduced as the result of hybridization and competition with non-native trout. Arizona trout occur in Grant and Ash Creeks in the Pinaleno Mountains. These trout were planted by Arizona Game and Fish Department personnel. The habitat quality of these streams is excellent and these populations appear to be secure.

There is currently no grazing or any other CNF activities that conflict with this fishery. The PCNFP therefore, is not expected to adversely impact this trout. However, should any unforeseen problem arise they would be covered by the aforementioned forestwide prescriptions, standards and guidelines.

Gila Topminnow

The historic range of this minnow has been drastically reduced due to competition from the introduced mosquito fish (*Gambusia affinis affinis*).

There is one natural self sustaining population of Gila topminnows within the CNF in the Redrock drainage, Canelo Hills. Twelve populations have been reintroduced, on the CNF, of which only two, Alambre tank and Yellowstone have established sustaining populations.

Grazing and recreational activities included in the PCNFP could adversely impact this minnow by reducing the quantity and quality of aquatic habitat. However, implementation of the aforementioned forestwide prescriptions, standards and guidelines should preclude these impacts.

Sonora Chub

The Sonora chub occurs only in Sycamore Canyon and its tributaries within the United States. Sycamore Canyon is the northern-most extension of this chub's natural distribution. Sycamore Canyon located within the Pajarita Wilderness supports a unique assemblage of fauna and flora. Because of its biological value this canyon has been classified a Research Natural Area (RNA).

Research Natural Areas are established to provide and protect natural diversity in all of its forms and permit only non-manipulative research, observation and study. Therefore, implementation of the PCNFP would not adversely impact this chub. Under the PCNFP there is a proposal to enlarge this RNA to include an additional 1,470 acres.

best copy available

The Sonora chub was proposed as a threatened species on June 6, 1984, Sycamore Creek was proposed as critical habitat.

Tumamoc Globeberry

This plant was first discovered in the Santa Catalina Mountains on July 30, 1984, the most recent discovery was in Sabino Canyon, in these same mountains. Its population on the CNF is estimated to be approximately 42 plants.

Recreational activities (hiking, picnicking, and camping) associated with the PCNFP could adversely impact this plant. However, the implementation of the aforementioned forestwide prescriptions, standards and guidelines should preclude these impacts.

The Tumamoc globeberry was proposed as an endangered species on May 20, 1985.

The potential impacts to the four listed species and two proposed species associated with the PCNFP include those resulting from; recreation (developed and dispersed), range management (grazing), mineral development, timber management and structural improvements (roads). Actions based on Forestwide prescriptions, standards and guidelines would identify, document, and correct adverse impacts from any of the aforementioned impact areas with the eventual goal of enhancing and promoting the conservation of these listed and proposed species on the CNF.

Biological Opinion

Based on the preceeding information, it is our biological opinion that your approval and implementation of the PCNFP for the CNF is not likely to jeopardize the continued existence of the peregrine falcon, bald eagle, Arizona trout, and Gila topminnow, but would promote the conservation of these species.

Of the alternatives described in the PCNFP and DEIS documents, alternative "D" would provide management prescriptions that better promote the conservation of these four listed and two proposed species, if implemented.

Further consultation is not required unless new information becomes available concerning the four listed species or two proposed species, new species are listed that may be affected by this action, or the proposed action is modified in a manner not considered in this biological opinion.

When Tumamoca globeberry becomes a listed species, a FWS permit will be needed for collecting activities and a Section 7 consultation will have to be performed on the proposed propagation study.

Because of the general nature of the actions proposed in the PCNFP, the CNF will have to consult with the USFWS on specific actions that may affect listed or proposed species.

We appreciate your interest and efforts in conserving endangered and threatened species.

Gilbert D. Metz
Field Supervisor

cc: Director, FWS, Washington, D.C. (OES)
Regional Director, Region 2 (SE, HR)
Director, Arizona Game and Fish Department, Phoenix, Arizona
Forest Supervisor, Coronado National Forest, Tucson, AZ

0728

UNITED STATES
DEPARTMENT OF THE INTERIOR
OFFICE OF THE SECRETARY
PACIFIC SOUTHWEST REGION
BOX 36098 • 450 GOLDEN GATE AVENUE
SAN FRANCISCO, CALIFORNIA 94102
(415) 556-8200

November 6, 1985

ER85/1050

Mr. R. B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

Dear Mr. Tippeconnic:

Attached is a copy of the additional comments received from the Fish and Wildlife Service regarding the Draft Environmental Impact Statement and Proposed Land Management Plan for the Coronado National Forest which is being forwarded for your consideration.

Sincerely,

Patricia S. Port
Patricia Sanderson Port
Regional Environmental Officer

Attachment

ccs:Director, OEPR (w/orig. incoming)
- Reg. Dir., BLM
- Reg. Dir., NPS
- Reg. Dir., BM
- Reg. Dir., FWS
- Reg. Dir., BR

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
NOV 8 1985
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UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

Ecological Services
2934 W. Fairmount Avenue
Phoenix, Arizona 85017

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RECEIVED
B.L.M. AZ STATE OFFICE
OCT [illegible] 1985
A.M.
PHOENIX, ARIZONA

October 21, 1985

Memorandum

To: State Director, Bureau of Land Management, Arizona State Office, Phoenix, AZ

From: Field Supervisor

Subject: Review of Draft Environmental Impact Statement and Proposed Land Management Plan for the Coronado National Forest, Arizona and New Mexico (3 Vols; MAPS) (ER-85/1050)

General Comments

1 Our Service appreciates the effort that was made in preparing the Coronado National Forest Plan and Draft Environmental Impact Statement; however, we found both documents to be overly complex and poorly organized. The style in which the documents were written made it very difficult to gain an overall prospective of the current situation as it exists on the Coronado National Forest.

2 Any decisions to be made on Mt. Graham should be delayed until the DEIS on the proposed astrophysical facility has been completed.

Specific Comments

Draft Environmental Impact Statement.

3 Page 65, Guadalupe Canyon. ISA should be WSA.

Pages 70 - 73, Tables 26 and 27

4 Scientific names should follow the listed common names in Table 26 to avoid any confusion that may arise with the existence of subspecies.

Both Tables 26 and 27 should include the common and scientific names of the species listed for consistency and to avoid any unnecessary confusion. In addition, Table 26 should list candidate species to be consistent with
5 Table 27.

Pages 70 - 71, Table 26, additions and corrections

Southern bald eagle is incorrected, it is the bald eagle (*Haliaeetus leucocephalus*).
Aplomado falcon (*Falco femoralis septentrionalis*) was proposed for listing as endangered on May 24, 1985.
Mexican stoneroller (*Campostoma ornatum pricei*) is a Category II candidate species.
Gila chub (*Gila intermedia*) is a Category I candidate species.
Spikedace (*Meda fulgida*) was proposed for listing as threatened, with critical habitat on June 18, 1985.
Ridge-nosed rattlesnake should be correctly listed as Arizona ridged-nosed rattlesnake (*Crotalus willardi willardi*), it is a Category II candidate species.
Gila monster (*Heloderma suspectum*) is a Category II candidate species.
Tarahumara frog (*Rana tarahumarae*) is a Category II candidate species.

Pages 72-73, Table 27, additions and corrections

Robbins cory cactus (*Coryphantha robbinsorum*) was proposed for listing as threatened on March 6, 1985.
Ruby Bundleflower (*Desmanthus Bicornutus*) is a Category IIIc candidate species.
5 Mudwort (*Limosella pubiflora*) is no longer a candidate species.
Tumamoc globeberry (*Tumamoca macdougalii*) was proposed for listing as endangered on May 20, 1985.
(*Vauquelinia pauciflora*) is a Category II candidate species, also correct spelling.

Proposed Coronado National Forest Plan.

6 Page 42, DU 10, 1. The first sentence should read, "Maintain and improve habitat." It is not always enough just to maintain habitat in order to insure the continued existence of the subject species.

7 Page 43, DU 10, 3. This "Standard and Guidelines" should provide not only for maintenance of existing vegetative diversity via mitigation, but should also provide for the improvement of degraded vegetative communities via an aggressive recovery effort. Maintaining current vegetation diversity may not be adequate, particularly when trying to increase or recover populations of threatened or endangered plant and animal species, particularly if it has been degraded by past forest practices.

8 Page 43, DU 10, 5. Extricated should be extirpated.

9 Page 43, DU 10, 7. The Endangered Species Act, as amended, does not provide for the mitigation of threatened or endangered species.

10 Page 43, DU 10, 9. The Coronado should not depend on the completion of recovery plans in order to develop management plans for critical habitat of designated endangered species. This should be initiated as soon as possible with the cooperation of the U.S. FWS, AGFD and New Mexico G&FD.

11 Page 52, DU 10-11, 1. Should read "Maintain and improve current habitat". Some habitat improvement in most cases will be necessary in order to work toward delisting.

12 Page 52, DU 12-15, 1. Should be revised to read "Improve quality and availability of forage and water for animal and plant species." Should not be exclusive to commonly hunted species.

13 Page 53, DU 12-15, 3. Habitat improvement should be added to this recovery effort.

14 Page 53, DU 12-15, 4. Should be revised to read "Maintain and improve current habitat", to not limit effort to just nesting habitat.

Page 55, DU 10, 1. Same as Page 52, DU 10-11, 1.

11 Page 59, DU 10, 1. Same as Page 52, DU 10-11, 1.

Page 63, DU 10, 1. Same as Page 52, DU 10-11, 1.

Page 65, DU 10, 1. Same as Page 52, DU 10-11, 1.

12 Page 66, DU 12-15, 1. Same as Page 52, DU 12-15, 1.

14 Page 66, DU 12-15, 4. Same as Page 53, DU 12-15, 4.

Page 70, DU 10, 1. Same as Page 52, DU 10-11, 1.

Page 72, DU 10, 1. Same as Page 52, DU 10-11, 1.

Page 76, DU 10, 1. Should read "maintain and improve".

Page 77, DU 12-15, 1. Should read "Delist threatened and endangered species by maintaining and improving habitat."

11 Page 78, DU 10, 1. Same as Page 76, DU 10, 1.

Page 78, DU 12-15, 1. Same as Page 77, DU 12-15, 1.

Page 81, DU 10, 1. Same as Page 52, DU 10-11, 1.

Page 85, DU 10, Last sentence should read "maintain and improve current habitat."

4 Page 135 I. List of Threatened and Endangered Species and Management
6 Indicator Species.

5 See comments made on Endangered, Threatened and Candidate Species in DEIS.

Thank you for the opportunity to review the two subject documents. If we can be of further assistance, please call us at (602) 246-2493 Comm or 261-2493 FTS.

Frank M. Baucom

Frank M. Baucom

cc: Regional Director, FWS, Albuquerque, NM (AHR)
Regional Director, FWS, Albuquerque, NM (SE)
Director, Arizona Game and Fish Department, Phoenix, AZ
Regional Supervisor, Arizona Game and Fish Department, Tucson, AZ

Agency response to
USDI, Fish and
Wildlife Service
Ecological Services

1. We agree the Proposed Forest Plan and DEIS are imposing documents. The Plan was presented in detail to allow people the opportunity to provide substantive comments on the proposed management direction. The purpose of the DEIS was to present the alternatives considered for management of the Forest and to disclose the predicted environmental consequences. The significant comparisons between alternatives were summarized in Chapter 2 to help people make a choice. Material in the rest of the document was to meet legal requirements as well as provide additional detail where it was thought appropriate. The DEIS essentially summarized all the information used in the entire planning effort.

2. Management decision for the Pinaleno Mountains have been made for all areas not directly affected by the proposed Mt. Graham Astrophysical Area. The only area directly affected is the 3500 acres originally proposed by Steward Observatory. Management direction for this entire 3500 acre area will be addressed in the Mt. Graham Astrophysical EIS. That EIS will contain a range of development as well as nondevelopment options, including wilderness for roadless areas within the 3500 acre area. Standards and guidelines developed from the analysis documented in the Mt. Graham Astrophysical EIS will be incorporated in the Forest Plan when the decision on land use for the 3500 acres is made.

   The allocation decision for the Mt. Graham Wilderness Study Area is being made in the Forest Plan. The Forest Plan was revised to recommend wilderness for all 62,000 acres of the WSA. Our analysis and public comment now indicates there are no conflicts between this wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Roadless portions of the Pinaleno Mountains outside the WSA were not considered for wilderness option.

3. The ISA has been changed to WSA.

4. Your suggestion to include both scientific names and common names in Tables 26 and 27, DEIS and Appendix I, Draft Plan is a good one. However, this would double the size of these tables and is unnecessary for a general use public document. The common names used for the wildlife species are generally accepted and understood by the public as well as technical specialists. On the other hand, common names for the plant species are not commonly accepted and was the reason for using only scientific names.

5. Corrections have been made to Tables 26 and 27, DEIS and Appendix I, Draft Plan, as you suggest except that the Spikedace (Meda fulgida) is not known to occur on the Forest and Robbins corycatus (Coryphantha robbinsorum) is adjacent to the Forest but not on Forest land.

6. The wording has been changed to state "Maintain or improve habitat...." We agree improving habitat is desirable, however, it is not always possible given other management constraints such as funding.

7. The wording has been changed to state "Maintain or improve current vegetative diversity...." We agree improving diversity is desirable, however, it may not always be possible with mitigation measures alone. Direct improvement projects are often necessary to improve diversity.

   Several respondents have questioned our use of the term "habitat maintenance" as opposed to "improvement" particularly in respect to T&E species. Wildlife habitats of the Coronado are generally in a good condition and we would be quite pleased if we could maintain the status quo. We are not aware of any area where habitat condition is a limiting factor for a threatened or endangered species. Our intention was to attempt to maintain the currently good conditions and to improve them where necessary. We appreciate you pointing out this potential source of misunderstanding.

Agency response to
USDI, Fish and
Wildlife Service
Ecological
Services
(continued)

8. The misspelling has been corrected.

9. The term mitigation has been replaced by "habitat needs."

10. We continue to plan for the management of unique species, whether listed or not. No "critical habitat" has been designated for any species on the Coronado and we do not have the authority to make such designations. We have supported your proposal to designate critical habitat for the Sonoran Chub and will continue to work with you on designation for the Mt. Graham spruce squirrel.

11. The terms "improve" or "improvement" have been added to all objectives applicable to management of threatened and endangered species.

12. The objective referred to is specific to management of game species. Although it is desirable to improve habitat for all plants and animals, it may not always be possible to finance such improvement projects. It is recognized that plants and other wildlife species will often benefit from these improvement projects. However, we cannot establish objectives that may not be feasible.

13. The reference to transplanting has been deleted as it is only one method for recovery. Individual recovery plans will specify the methods, including habitat improvement and transplanting.

14. The wording has been revised as you suggest.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
POST OFFICE BOX 1306
ALBUQUERQUE, N.M. 87103

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October 24, 1985

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

OCT 28 1985

RECEIVED

Mr. Robert Tippeconnie
Forest Supervisor
Coronado National Forest
300 W. Congress
Tucson, Arizona 85701

Dear Robert:

As requested by the Forest Service, the Mexican Wolf Recovery Team has reviewed your proposed land management plan. Since recovery teams serve at the discretion of the U.S. Fish and Wildlife Service, the Mexican Wolf Recovery Team has provided their comments to me rather than directly to the Forest Service.

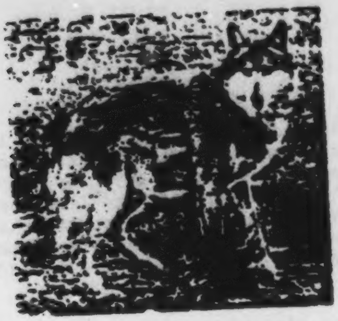
Attached is a copy of the comments I received from Ms. Norma Ames, leader of the recovery team. It appears that the team prefers "Alternative D" of your proposed management plan. Thank you for providing the recovery team with an opportunity to review the management plan. Please let us know if we or the team can be of further assistance.

Sincerely yours,

Curtis J. Carley

Curtis J. Carley
Endangered Species Biologist

Attachment



MEXICAN WOLF RECOVERY TEAM
P.O. Box 4233
Santa Fe, New Mexico 87502

Norma Ames, Leader
New Mexico Department of Game and Fish
P.O. Box 4233
Santa Fe, New Mexico 87502

Jose C. Trevino
Dirección General de la Fauna Silvestre
Arquitectura No. 916
Chihuahua City, Chihuahua, Mexico

Larry Allen
U.S. Forest Service
Coronado National Forest
301 West Congress
Tucson, Arizona 85702

Dennis A. Meritt, Jr.
American Association of Zoological Parks
and Aquariums
Lincoln Park Zoological Gardens
2200 North Cannon Drive
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Gary Henry
U.S. Fish and Wildlife Service
P.O. Box 9037, [illegible] Sta.
San Antonio, Texas 78204

Dr. Gary Harwell
Arizona-Sonora Desert Museum
Route 9, Box 900
Tucson, Arizona 85704

September 19, 1985

Mr. Michael Spear, Regional Director
U. S. Fish and Wildlife Service
P. O. Box 1306
Albuquerque, New Mexico 87103

Dear Mr. Spear:

The Coronado National Forest has long deemed its unique wildlife resources worthy of special consideration, and its management plans have shown concern for endangered and nongame species. Management of the lands of the Coronado National Forest has, of course, a special effect on prospects for restoring the Mexican wolf within its historic range.

As you know, the Coronado National Forest is soliciting comments on its proposed land management plan to assist it in preparation of the forest's final plan and environmental impact statement. It wishes to receive comments by October 11, 1985. Because of the importance of the Coronado to the Mexican wolf recovery program, the Mexican Wolf Recovery Team would appreciate consideration by the U. S. Fish and Wildlife Service of the following comments, either for separate forwarding to the Coronado by FWS or for inclusion in comments that FWS may be making to the Coronado.

1 Of the alternatives offered by the proposed plan, Alternative D likely offers the best prospects for the Mexican wolf, because of Alternative D's emphasis on retention of wildlife values and natural environments. The fact that Alternative D promises higher livestock production than does the Preferred Alternative would appear to make D less favorable to wolf presence, but we assume the difference in livestock-production figures results at least in part from the difference between constrained (Preferred Alternative) and unconstrained (Alternative D) management costs.

2 Because of the nature and location of the involved habitats, wilderness designation for the Bunk Robinson and Whitmire Canyon Wilderness Study Areas would be particularly helpful to the wolf recovery program. These areas are in the heart of the Peloncillos' wolf country. While a wilderness-area label could actually attract some additional visitors to the areas, that would not be as detrimental to a wolf populatwon as road developments in the area.

Thank you for your consideration of these comments.

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SEP 23 '85
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Sincerely,
Norma Ames
Norma Ames, Team Leader

cc: Team members

**Agency response to
U.S.D.I.
Fish & Wildlife
Service
Mexican Wolf
Recovery Team**

1. Our analysis of alternatives indicated no particular difference in impacts on wolf habitat between alternatives PA and D. The factors which make up good wolf habitat are largely related to habitat factors for prey species, and any plan to improve range conditions for wildlife and livestock has the indirect effect of improving the habitat for the carnivores that prey on these animals. The Proposed Action was selected as the Forest Plan because we feel it best responds to all issues, concerns, and opportunities within anticipated budget limitations.

2. In areas such as this where timber and mineral resources are limited there is little reason to construct new roads, and wilderness designation would inhibit our ability to manage the other wildlife of the area. For example, the only population of Gould's turkey in the United States occurs partly in the Bunk Robinson and Whitmire Canyon Wilderness Study Areas. We have identified some opportunities to enhance turkey habitat through fencing and water development, but should the area become wilderness, these opportunities would be lost. Another lost opportunity would be that of using prescribed fire to maintain or improve deer habitat. We are, therefore, proposing that these two study areas be designated nonwilderness.

   Many people advocate wilderness status for areas which currently support populations of wolves, as you have. We agree that some limits on land use and amount of visitation from recreationists is desirable, but do not believe that a formal wilderness designation is the best way to accomplish this. We do not foresee any real changes in the Peloncillos during the ten or fifteen year life span of this plan.

0674

UNITED STATES
DEPARTMENT OF THE INTERIOR
OFFICE OF THE SECRETARY
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BOX 36098 • 450 GOLDEN GATE AVENUE
SAN FRANCISCO, CALIFORNIA 94102
(415) 556-8200

October 15, 1985

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 1[illegible] 1985
RECEIVED

ER85/1050

Mr. R. B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

Dear Mr. Tippeconnic:

The Department of the Interior has reviewed the Draft Environmental Impact Statement (DEIS) and National Forest Plan (Plan) for the Coronado National Forest and has the following comments.

General Comments

Wildlife

1 Despite the note of its importance on the Coronado National Forest, wildlife is given minimal consideration. The Plan is not specific as to reintroduction efforts nor wildlife habitat improvements, i.e., catchments, riparian exclosures, etc. It is not clear as to what will be accomplished for wildlife.

2 The monitoring detailed in the plan is keyed to indicator species. The indicator species concept is in disrepute with many biologists and academia.

Chiricahua National Monument

3 The Plan does not show or mention the new boundary that exists between the Forest and the northern border of the Monument. We recommend this be corrected before the plan is adopted.

4 With regard to fire management strategies, the Forest Plan calls for the area surrounding the monument to be placed in Fire Management Zone 1. The policy for this zone states: "The appropriate suppression response in this zone will

4 be predicated upon preventing fires from reaching or damaging high value resources and improvements" and "containment and control will be used to accomplish this objective during very high and extreme fire danger." The definitions supplied in the plan imply that the forest management strategies will coincide with those of the Monument in the areas where boundaries meet. However, the plan only gives a brief description of the Forest's overall Fire Management Plan and we are not certain if it provides for a goal of allowing natural fires to occur, a goal that the Monument is attempting to achieve. Before we can be sure that our goals will be compatible, a review of both the Forest's and the Monument's fire plans should be done, followed by a meeting between the staffs in order to resolve any conflicts.

5 We recommend coordination between agencies regarding resource management studies. The Forest Service is planning several studies for which the results would be of great benefit to the Monument. Further, the Forest is planning to conduct air quality research that has been ongoing in the Monument for several years.

Coronado National Memorial

6 With the exception of Alternative B, the proposal and the other alternatives indicate an area along the northern boundary of the Memorial, between Montezuma and Bob Thompson Peaks, to be open for fuelwood harvest. In order to avoid the possibility of fuelwood cutting intrusions on Memorial lands, we recommend that a buffer excluding this use be established along the boundary. The unimproved road in this area may preclude wilderness designation but would aid in fuelwood cutting and other potential adverse uses if not closely managed. In addition, we suggest that the west boundary of the Memorial be designated Zone 1 for fire suppression. The Montezuma Pass/Coronado Peak area is a prime interpretative site for the Memorial and is a resource of high value with buildings and other improvements. This will also coincide with the designation given Fort Huachuca and other areas in the Huachuca Mountains.

Other than the above-stated concerns, the management prescription contained in the proposed action and Alternatives A, B, C, and D are compatible with the management requirements of Coronado National Memorial.

Saguaro National Monument

7 As presented, the Transportation System and Utility Corridor would have no adverse impact on the Monument, and the off-road vehicle proposal offers protection to the Monument. We do have reservations about the Fire Suppression Zone next to the Monument. This has a Zone 2 classification with emphasis on suppression with the least cost and minimum resource damage. In order to be more compatible with Monument Fire Management Plan and management philosophy, it would be preferable if the Forest adopted a more widespread natural prescribed fire response. This type of response is stated as the proposed response for Management Area 9 (wilderness), but not so for Management Area 4 (non-wilderness), which is located along the Monument's north wilderness boundary.

8 We are concerned with the fact that the Plan proposes grazing and fuelwood gathering to occur right up to the Monument's wilderness boundary. As with fire, this is in Management Area 4 along the Monument's north boundary. In this five-mile-plus stretch abutting the Monument wilderness, such practices are not compatible with the Monument's wilderness management and protection policy. On page 81 of the Plan, under Standards and Guidelines, it is stated:

> "6. Cooperate with Saguaro National Monument to implement as nearly identical management of the Rincon Wilderness as possible. Develop a joint operation and maintenance plan."

This is a guideline with which we wholeheartedly concur, and recommend it be extended to those areas where our respective wilderness boundaries do not coincide. The establishment of a buffer zone to keep grazing and fuelwood gathering farther away from the Monument's wilderness boundary would be the initial move toward more compatible management practices, especially where wilderness protection is involved.

9 Table 8 (page 27) of the proposed plan lists Italian Trap as a site for the future construction of a campground with a 200 PAOT capacity. Such a campground has the potential of generating heavy use impact on the Monument's Italian Springs Trail and subsequent high country wilderness use. This potential increase in use should be addressed in any future trail plan that might arise from the Monument's GMP which is now being asembled.

Cultural Resources

10 While the DEIS satisfactorily addresses cultural resources, the accompanying Plan does not. Does the Coronado National Forest have a Cultural Resources Management Plan? Have cultural resources overviews (that include research designs and/or research domains) been completed for the component forests? We recommend that the cultural resources management portion of the Plan should include the following:

(a) legislative mandates and the compliance process;

(b) a summary overview of the prehistoric and historic cultural values including inventories conducted to date; a breakdown of the number and types of sites already identified in previous surveys, the number and types of sites already determined eligible or potentially eligible for nomination to the National Register of Historic Places; and potential impacts to National Register or eligible properties;

(c) the cultural resources plan should then provide a series of projected (5-year) management directives/objectives/alternatives with a discussion of how each directive will be implemented. These directives should be evaluated on an annual basis and revised as needed.

Minerals

We agree with the stated goal for management direction for minerals: "Support environmentally sound energy and mineral development and reclamation." The intent of the stated goal is lost, however, with the negative form of the minerals issue: "Identification of sensitive areas and formulation of recommendations for needed withdrawals from mineral entry." We would rather see this important issue stated in a broader, more positive way, such as: "Identification of areas available for mineral activities, and restrictions necessary to protect other resources."

The discussion of mineral resources is unnecessarily brief and fragmented. The sections on mineral resources do not adequately describe the known mineral endowment and substantial potential of the Coronado National Forest. Although Tables 4-5, 33-34, and 63-64 (DEIS), and Table 5 (Plan) are commendable because they quantify some important data on minerals in the Forest, there is virtually no discussion to place these resources in perspective or to show the relation between areas of mineral potential and areas available for mineral activity. Additional supporting discussion and/or maps would greatly improve these sections and allow better assessment of mineral-related impacts in Chapter 4 of the DEIS.

11 The reports correctly state that a large portion of the Forest is at least theoretically favorable for locatable, leasable, and/or saleable minerals. Only a few (e.g., oil and gas, copper, gold and silver) are specifically identified; many more commodities could be mentioned, including lead, fluorspar, manganese, molybdenum, tungsten, uranium, and zinc. The acreage data for mineral potential are unchanged from earlier draft reports dated September 1982, and apparently do not reflect studies by the U. S. Geological Survey (GS) and Bureau of Mines (BM) of wilderness and adjacent areas in many parts of the Forest.

To assist you in the evaluation of impacts on mineral exploration and development, we have listed recent GS and BM studies of wilderness areas in the Coronado National Forest. Most of the information also is summarized in GS Professional Paper 1300. Oil and gas potential of wilderness lands in the Forest is shown on GS Map I-1537. Although several of the areas studied no longer are wilderness or wilderness study areas, the mineral potential evaluations of these areas should be valuable aids in managing the Forest.

Bunk Robinson Peak - (GS Map MF 1425-B)
Chiricahua - (GS Bulletin 1385-A and Map MF 1385-F)
Dragoon Mountains - (BM Report MLA 35-82 and GS Map MF 1521-B)
Galiuro - (GS Bulletin 1490)
North End - BM Report MLA 1-83 and GS Map MF 1412-D)
Pusch Ridge - (BM Report MLA 118-82 and GS Map MF 1356-B,-C)
Rincon - (GS Bulletin 1500)
Whetstone - (BM Report MLA 129-82 and GS Map MF 1614-A)
Whitmire Canyon - (GS Map MF 1425-B)
Winchester - (GS Open-File Report 82-1028)

11 The Bureau of Mines has not studied the Miller Peak, Mt. Wrightson, Pajarita, or Santa Teresa Wilderness Areas or the Mt. Graham Wilderness Study Area.

Under the Plan, about 1.32 million acres, or 76.3 percent, of the Forest would be available for locatable minerals exploration, and 1.34 million acres, or 77.5 percent, would be available for mineral leasing.

Nearly 340,000 acres of wilderness are unavailable for locatable and leasable minerals development, and an additional 23,000 acres are withdrawn from mineral entry for locatable minerals and restricted from mineral leasing. Mineral activities would be restricted on additional areas as well. Most important, however, is the relationship - not discussed in the Plan or DEIS - between availability and favorability for minerals.

Apparently the only measure used to evaluate mineral-related impacts is the acreage of mineral withdrawals and retricted areas. Mineral potential of withdrawn or restricted areas has not been considered. Yet, the significance of impacts on minerals relates primarily to the availability of those areas having mineral potential. While the withdrawal of an area having no known potential is relatively insignificant, withdrawal of an area known to have moderate or high potential may be significant.

The section on mineral-related impacts (DEIS, pp. 110-113) should describe clearly the availability of the Forest for mineral exploration and development. Moreover, it should discuss the significance of overlap between the substantial acreage that is unavailable or restricted and areas having mineral-resource potential. Finally, the acreage restricted under each alternative (DEIS, Tables 63-64) should include remaining wilderness study areas, which must be adminstered to maintain their wilderness character, regardless of alternative recommendatons for forest management (DEIS, p. 67).

Specific Comments

DEIS

12 Page 35: Table 4, Issue #9, presents the acreage of locatable and leasable mineral "restrictions" and "withdrawals" for the various alternatives. The acreage for locatable mineral "restrictions" does not appear to be consistent with the acreage provided in Table 63 (p. 111) for the various alternatives. The acreage for locatable mineral "withdrawals" is inconsistent.

13 Page 47: Resource benefits - Receipts to U. S. Treasury (Table 11) - does not appear to include revenues to the United States from mineral leasing or mineral material sales. It should also be noted that 50 percent of mineral lease revenues are returned to the states (Sec. 317 of FLPMA) instead of the indicated 25 percent return in Table 11 (p. 48). Mineral leasing is provided for on 1,342,139

13 acreas of the Forest and can generate significant mineral lease revenues.

14 Page 69: The word "Sobaripuri" is spelled incorrectly. It should be "Sobaipuri".

Last paragraph - evaluation of cultural resource properties strictly in terms of their eligibility for listing on the National Register of Historic places is not sufficient for land use planning. Suggest you adopt the use allocation system established by your Regional Office for New Mexico forests. It could be modified for use in Arizona.

15 Page 70: Paragraph 2 - do you have any plans for preparing a Cultural Resource Inventory Plan such as those prepared by Forests in the Pacific Northwest Region? Such a plan and the evaluation system discussed above would be a natural outgrowth of the Class I overview of southeast Arizona. It would "localize" the overview and provide an inventory plan complete with research objectives and a methodology.

16 Pages 74-75:

According to the most recent American Ornithologists' Union nomenclature revision, the coppery-tailed trogon has been renamed elegant trogon, and Mearns quail has been renamed Montezuma quail.

Pages 79-80:

Sixty-one percent of the Forest acreage is considered to have potential for locatable minerals. The location and distribution of these mineral occurrences is probably more important to an understanding of the impacts to mineral availability of the management prescriptions in the Plan.

17 The Coronado National Forest includes 49 different metallic mineral districts as defined by the Arizona Bureau of Geology and Mineral Technology, Bulletin 194. Some of these districts also include strategic and critical mineral occurrences that may be impacted by the various management alternatives. Potential alunite (aluminum) resources have been identified in the Patagonia (Red Mountain) area. The significance of strategic and critical minerals has not been recognized in the Plan.

18 The discussion of oil and gas is indicated to be related to the existence of the Overthrust Belt. Probably of greater significance to the potential for oil and gas in southeastern Arizona is the northwest extension of the Pedregosa Basin from New Mexico into Arizona. The thickness of Paleozoic rocks exceeds

5,000 feet in the Pedregosa Basin area, and the thermal-maturation of these rocks indicates high potential for oil and gas. References include:

18 Greenwood, E., F. E. Kottlowski, and S. Thompson, 1977, Petroleum potential and stratigraphy of Pedregosa Basin: AAPG Bulletin, v. 61, pp. 1448-1469.

Wardlaw, Bruce R., and Anita G. Harris, 1984, Conodont-Based Thermal Maturation of Paleozoic Rocks in Arizona: AAPG Bulletin, v. 68, pp 1101-1106.

Pages 110-112:

19 The Mineral section begins with a statement regarding the "impacts from mineral prospecting, exploration, and development." The focus of this section should be on the "impacts upon mineral prospecting, exploration, and development" by the Plan and other management alternatives.

20 Tables 63 and 64 provide an overview of the acreage of mineral withdrawals and restrictions for both locatable and leasable minerals. Although these withdrawals and restrictions only represent about 25 percent of the total Forest acreage, there is no discussion of the significance of these withdrawals and retrictions. The significance of the negative impact upon mineral exploration is determined by the mineral potential of those specific areas that are closed to mineral exploration/development (even though those areas may represent a small percentage of the total Forest). The significance of the positive impact to mineral exploration/development is determined by the availability of those areas with mineral potential. The withdrawal of an area with no mineral potential is insignificant, but the withdrawal of even a small sized area with high mineral potential can be significant.

Page 126: Mention is made of transfer of a part of the Santa Teresa Mountains to the San Carlos Apache Tribe. The statement that the Coronado National Forest is cooperating in this effort, however, is in error. There is considerable controversy between the Tribe and the Forest Service on this matter. The Forest Service is fostering plans associated with the issue that we think may be detrimental to environmental quality.

21 The Forest Service is insisting that, as a condition of the land transfer, unlimited public access to the Santa Teresa Wilderness be granted. This access would be across Indian land, and yet no discussion of the environmental consequences was noted in the DEIS, particularly those impacting the Reservation. Such access would make archeological, historic, and other Tribal resources much more available to those persons who illegally exploit them for profit. The Forest Service must address this issue. To do

21 otherwise would be a violation of the National Environmental Policy Act, for failure to give adequate consideration to (a) the transfer's cultural, social or economic effects on the San Carlos Apache Tribe, or (b) the means to mitigate such effects.

Plan

22 Page 39: Table 20 indicates a total of 1,726,514 acres in the various management areas for the Coronado National Forest. It is unclear whether this represents the total acreage of the Forest since a summary of land ownership or status is not provided in the Plan.

23 Page 42: Item 8 - why allow natural deterioration of the Powers Cabin Site? The site is listed on the National Register of Historic Places. Allowing it to deteriorate is an adverse effect under 36 CFR 800 and a violation of Section 106 of the National Historic Preservation Act. We realize that natural processes are supposed to be allowed to continue in wilderness areas, but unless the specific designation legislation forbids it, such values as significant cultural resources should be preserved. This can generally be done without degrading wilderness values.

24 Page 46: The management prescription for common variety minerals indicates the aggregate sources will be utilized for identified transportation plans. It is unclear whether there are demands for common variety minerals, other than road construction, that will not be met by this management prescription.

25 Page 71-74: The Management Practices in Management Area 7A and 7B for minerals (DU 36 and DU 42), consider withdrawals to protect essential habitats for threatened and endangered species. It is not known whether this acreage is included in the withdrawal acreage reported in Table 63 (DEIS).

26 Page 80: Management Area 9 is indicated to include 368,390 acres for wilderness management in the proposed action. This acreage is inconsistent with page 28 of the DEIS (372,035) and page 111 of the DEIS (372,000 acres).

27 Pages 93-94: According to the most recent American Ornithologists' Union nomenclature revision, the coppery-tailed trogon has been renamed elegant trogon, and Mearns quail has been renamed Montezuma quail.

Thank you for the opportunity to review and comment on this DEIS and Plan.

Sincerely,

Patricia S. Port

Patricia Sanderson Port
Regional Environmental Officer

ccs: Director, OEPR (w/orig. incoming)
Reg. Dir., BLM
Reg. Dir., NPS
Reg. Dir., BM
Reg. Dir., FWS
Reg. Dir., BR

Agency response to
USDI, Pacific
Southwest Region

1. We disagree with your assessment of the wildlife habitat management portion of the Coronado National Forest Plan. Estimated habitat improvement needs are shown by type of activity in Table 16 of the Draft Plan. Each management area prescription contains specific objectives, standards, and guidelines to maintain and improve wildlife habitat. Some of those are specific to individual wildlife species. In addition, Appendix C of the Draft Plan contains specific standards and guidelines to maintain and improve wildlife and plant diversity while managing for other resource uses such as wood harvest and livestock grazing. Reintroduction objectives are displayed on page 43, Draft Plan. Specific species have not been identified because plans have not been completed by the responsible agencies--State Game and Fish Departments and U.S. Fish and Wildlife Service. The only species being actively considered for reintroduction at this time is the desert bighorn sheep.

2. Use of the indicator species concept for wildlife monitoring was dictated by the National Forest Planning Regulations. We understand that this idea originated from the committee of scientists.

   Early in the Coronado N.F. planning process all interested wildlife managers were invited to participate in the selection of indicator species. Participants in this process included representatives of Arizona Game and Fish, U.S. Fish and Wildlife Service, the University of Arizona, Tucson Audubon Society, the Nature Conservancy, and Forest Service Wildlife Biologist. They agreed on a list that seemed appropriate at the time.

   As new techniques or methods are developed to monitor impacts on wildlife habitats and populations, those that are appropriate to our situation and needs, will be adopted.

3. The Draft Forest Plan Map did show the affected lands to be in a status other than National Forest. The boundary symbol does need to be moved and will be done for the Final Plan.

4. Direction in the Forest Plan does allow for fires (natural or man-made) to burn under prescribed conditions and in prescribed areas to meet resource objectives. Fire Management Zone 1 includes areas where resource values are considered high and the conditions for allowing prescribed fires are tighter than in Zone 2 where the values are generally lower.

   We agree that members of the two agencies should meet to discuss and develop the site specific conditions under which prescribed fires would be allowed.

5. We agree that studies and research should be coordinated. No one can afford to duplicate these efforts.

6. Most of the National Forest land you refer to along the northern boundary of the Memorial is in Management Area 1. Fuelwood harvest is an unsuitable practice in this area. Small portions of the Forest along the boundary are in Management Area 4. Fuelwood harvest is an acceptable management practice for this area, however, it does not mean we consider all acres suitable for fuelwood harvest. All fuelwood harvest is done under permit and is closely managed. If illegal cutting becomes a problem due to the road access, we can deal with that problem. Therefore, we see no need to develop buffers along the boundary.

   Management direction for Fire Management Zone 2 also prescribes that life and property be protected under all conditions. The National Forest lands west of the Memorial boundary are basically woodland types and Fire Management Zone 2 best fits our overall resource management needs. Therefore, we think Zone 2 management will meet needs and concerns of both agencies.

7. Fire Management Zone 2 and Zone 1 both provide direction to allow all fires (natural or man-caused) to be used within prescribed conditions and in prescribed areas to meet resource objective. We no longer make a

distinction between natural or man-caused fires in this respect. The only difference between Management Area 4 and 9 are the conditions under which fires may be prescribed. With the new policy, wilderness fire prescriptions are generally more limited than prescriptions for the nonwilderness portions of the Forest.

8. Our intent is to cooperate with the Monument whenever and wherever possible. This must be a two way cooperation given the differing missions of the two agencies. The basic mission of the National Forest System is one of multiple use management, including management of the wilderness resource. The guideline you refer to was primarily intended to seek cooperation in management of fires and recreational use. Livestock grazing and fuelwood harvest activities are done under permit and are subject to close administration. If problems arise, they can be dealt with as necessary.

   Based on this, we see no rationale to establish buffer zones as you suggest.

9. The development of recreation sites, such as Italian Trap, are for the purpose of responding to public demand for recreation opportunities. While development of recreational facilities may have spin-off effects on other areas, we can not ignore the fact that demand increases with increases in population. All proposed recreation sites would be subject to site specific environmental analysis prior to any final decision for development. The analysis would, of course, include possible impacts on adjoining lands.

10. Standards and guidelines for management of cultural resources will be revised to assure consistency with the requirements contained in the settlement agreement entered as final judgement in the Region 3 cultural resources lawsuit (Save the Jemez, et al., vs. Block, et al.; State of New Mexico vs. Block and Peterson). This agreement contains minimum standards for the following: design and execution of on-theground inventories; training and supervision of personnel conducting cultural resource management work; marking, protection and inspection of identified cultural resources during undertakings; damage assessment procedures and prosecution of damage claims; nomination of cultural resources to the National Register of Historic Places; inspection of National Register and other properties; site stabilization and repair; recording and data recovery for sites to be affected or destroyed; protection of cultural resources from vandals; management and conduct of undertakings; treatment of sites discovered during undertakings; and data sharing with State Historic Preservation Officers.

    The settlement agreement also requires that within 18 months following October 1, 1986, Region 3 Forests will review and further address the cultural resource elements provided for in Forest Planning (36 CFR 219.24). The level of detail to be included in this effort will be defined in Regional guidelines developed in consultation with appropriate State Historic Preservation Officers. The final Forest Plan will specifically provide for the expansion of these cultural resource elements in accordance with the terms of the settlement agreement.

11. At the time the issues, concerns, and opportunities were identified, the only concern related to mineral resource development was to identify areas of the Forest that should be withdrawn from mineral entry to protect other resource values. The wording is not intended to be negative, but only to state the concern as it was presented. We believe the concern is correctly stated. It would be inappropriate to reword it at this time. The other side of the whole issue--identification of areas available for mineral activities--is addressed in the analysis and documentation.

    You indicate the DEIS did not adequately describe the known mineral endowment or potential of the Coronado National Forest. We have added additional narrative and a table to the Minerals Section, Chapter 3, FEIS, to summarize the local, Regional, and National significance of the Coronado

Agency response to
USDI, Pacific
Southwest Region
(continued)

National Forest's mineral resources and mineral potential. In addition, we have revised Table 33, Chapter 3, DEIS, to show the relationship between areas with mineral potential and areas available for mineral activity. Additional narrative has been added to the Minerals Section, Chapter 4, FEIS, discussing the significance of mineral withdrawal impacts of each alternative on mineral exploration and development.

The USDI is concerned that the results of various wilderness study area mineral reports were not available for consideration at the time that the mineral potential was being incorporated into the planning process. We have reviewed the reports. The lands identified in those reports as having "substantiated" and "probable" mineral potential do for the most part, compare with lands of the "demonstrated favorable" and "theoretically favorable" categories in the DEIS. No significant modifications are needed.

12. We agree. There are also errors between Table 4 and Table 64 (page 112). The correct acreages are given in Tables 63 and 64. Corrections will be made in the Final EIS.

13. You are correct that revenues to the United States from mineral leasing or mineral material sales do not appear in Table 11, DEIS. This is the reason that mineral lease revenues returned to the States was also not reported or noted in the footnote.

Mineral benefits were not reported in Table 11 because they were calculated to be the same for all alternatives and did not affect the evaluation of alternatives based on benefits derived or present net value. The same was true for water-yield benefits.

An explanation of this has been added to the Final EIS.

14. The spelling has been corrected.

15. See response number 10.

16. We acknowledge the name changes for the coppery-tailed trogon and Mearn's quail. However, the names as they now exist in our planning documents are still commonly used and appear in many current internal and external references. For this reason we prefer not to make any common name changes at this time.

17. You also express a desire to see a complete list of the mineral commodities that are found in the Forest, with an identification of critical and strategic minerals. That listing is also included in the final documents.

18. Your references and other sources of information concerning the oil and gas potential of the Pedregosa Basin are being reviewed. This may result in some Forest lands being classified as theoretically favorable for oil and gas. More specific identification of these lands will be made after consideration of the available data.

19. We agree. We have changed the wording in the FEIS to reflect "impacts to and from mineral prospecting, exploration, and development."

20. Please refer to response number 11.

21. By an agreement dated February 25, 1896, and ratified by the Act of June 10, 1896 (29 Stat. 360), the San Carlos Indian Tribe ceded to the United States approximately 232,000 acres of land designated as the San Carlos Mineral Strip in the southern part of the San Carlos (formerly the White Mountain Apache) Indian Reservation. Subsequently, on March 21, 1917, the President added a part of this to the Crook National Forest by proclamation. The Crook National Forest then became a part of the Coronado National Forest. The cession acceptance by Congress provided that the Tribe would be given any receipts from the "sale of mineral lands." These receipts have been very small and periodically during the past 50 years the Tribe has sought recovery of the land. The Tribe made a strong effort

Agency response to USDI, Pacific Southwest Region (continued)

to acquire the land in about 1958-59. This was vigorously resisted by the livestock ranchers. In 1963, the Department of Interior attempted to compromise by reconveying the mineral rights in these lands to the Tribe. On the premise that the disposition of minerals in National Forest lands is a function of the Interior, the Department of Agriculture made no objection. The Order did stipulate that the Tribe would agree that extraction of the minerals would be subject to conditions adequate to protect the surface.

In January, 1969, Secretary of Interior Udall signed an order (34 F.R. 1195) purporting to restore to the San Carlos Tribe of Arizona the surface rights to the San Carlos Mineral Strip. Of the 232,320 acres in the strip, about 10,650 are within the Coronado National Forest.

This action was taken without the concurrence of the Secretary of Agriculture. The Department of the Interior received numerous letters and opinions over the years stating the Department of Agriculture's position that the return of the National Forest portion of the strip by order was not legal. However, by letter dated November 17, 1976, the Chief advised Senator Barry Goldwater that the Forest Service was "reviewing with representatives of the Department of the Interior the question of what administrative action can now be taken to affect the proposed transfer of the San Carlos Mineral Strip."

The Forest Service maintains that the National Forest lands were not subject to the authorities under which the Secretary of Interior's Order was issued, and there is no other authority by which the Secretary of the Interior could legally transfer National Forest lands to the Tribe. The Secretary of Interior's action has created jurisdictional problems not yet resolved, despite many years of effort by the respective Departments. The primary issue needing resolution is public access to remaining National Forest and other public and private lands in the Santa Teresas. The jurisdictional question and final resolution must be made at the National level. During 1984 and 1985, the respective Departments have reviewed and worked on legislation to affect this land transfer.

We disagree with the inference that the Forest Service is not cooperating in the effort to transfer the Mineral Strip portion of the Santa Teresa Mountains of the Coronado National Forest to the San Carlos Apache Tribe. We maintain the Coronado Forest has actively supported the land transfer. The Forest has met with the Tribe, the Tribal Chairman, the Bureau of Indian Affairs--San Carlos Agency Superintendent, and BIA area personnel as well as the Tribal Attorney on this matter. As a public agency we have the responsibility to insure public access to public lands. We have not insisted on "unlimited" public access, only on reasonable public access.

We believe access across a portion of the lands of the San Carlos Apache Reservation is the only reasonable way to reach the northeast portion of the National Forest System lands of the Santa Teresa Mountains regardless of the land in question. That access is open and has historically been open. We seek only to insure that access remains available not only to the Forest Service, but also to the public, who we believe have a right to the use and enjoyment of their lands.

22. The 1,726,514 represents the total public land acreage administered by the Coronado National Forest.

23. The Powers Cabin is located in a relatively inaccessible area regardless of the recent wilderness designation. This makes stabilization and maintenance efforts quite difficult. Because the area is now within the Galiuro Wilderness, impacts to the site should be minimal. The site's setting is being maintained and there is sufficient documentation (written and photographic) so that a permanent record of the site exists.

24. Common variety materials will be available for other uses only after Forest Service in-service needs are met and if no undue adverse impacts are foreseen.

Agency response to
USDI, Pacific
Southwest Region
(continued)

25. No essential habitat has been identified as of this date, therefore, no acreage estimates are shown in Table 63, DEIS.

26. There is no inconsistency between the Draft EIS and Forest Plan as you suggest. Management Area 9 includes those wilderness acres not also designated as research natural areas. The acreage (3,645 acres) given for Management Area 8A (RNAs inside wilderness) is the difference between the 372,035 acres (DEIS) and 368,390 acres (Plan). The 372,000 acres on page 111 of the DEIS is the result of rounding and has been corrected in the FEIS.

27. See response number 16.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

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FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

OCT 15 1985

RECEIVED

OCT 1 1 1985

R. B. Tippeconnic
Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

Dear Mr. Tippeconnic:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) and Forest Plan titled PROPOSED CORONADO NATIONAL FOREST PLAN; PIMA, PINAL, COCHISE, GRAHAM AND SANTA CRUZ COUNTIES, ARIZONA and HIDALGO COUNTY, NEW MEXICO. We have the enclosed comments regarding this DEIS.

1a We have classified this DEIS as Category EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of Rating Definitions and Follow-Up Action"). This DEIS is rated EC-2 because water quality and riparian habitat impacts from proposed management activities are not fully addressed. The classification and date of EPA's comments will be published in the Federal Register in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send three copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Juli Jessen, Federal Activities Branch, at (415) 974-0257 or FTS 454-0257.

Sincerely yours,

Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy and Management

Enclosure (3 pages)

Water Quality Comments

1 1. The DEIS estimates that 31 percent of the Forest watershed is in unsatisfactory condition and proposes both direct and indirect treatments to improve these conditions (p. 79). At the end of the planning period, the preferred alternative is projected to have a smaller amount of improved watershed than the other alternatives. Because water pollution, especially sedimentation, is a "major concern," (DEIS, p. 78) EPA recommends that the Final Forest Plan include additional watershed improvement measures, as have been proposed in the nonpreferred alternatives.

2 2. The DEIS states that riparian areas are very important for many uses, but cover only three percent of the Coronado National Forest (p. 56). EPA recommends that practices to preserve these valuable ecosystems be included in the Forest Wide Standards and Guidelines. Particularly, guidelines for construction of developed recreation sites, roads and bridges in riparian areas should be included. The Range Standards and Guidelines should outline a plan to mitigate impacts from cattle overusing riparian areas. Without these measures, water quality problems of sedimentation and fecal coliform bacteria loading will persist. Finally, if timber or fire management activities will occur near streams, guidance should be provided to protect water quality and the riparian habitat.

3 3. The Forest Plan presents a Summary of Fire Management Activities (p. 87). This summary discusses only fire suppression. If additional fire management, such as prescribed burning, will be practiced on the Forest, then guidelines for these activities should be mentioned in the Final Forest Plan. These guidelines should indicate how acreage designated for fuel breaks will be protected from erosion (i.e. the amount of vegetation which will remain).

4 4. The FEIS should briefly discuss existing conditions resulting from current mining activities, including the nature and causes of contamination of Harshaw Creek. Potential impacts of proposed mining activities and associated roadbuilding also should be addressed. In particular, the Plan should include restrictions or guidelines for development on highly erodible soils or steep slopes.

5 5. The Water and Soils Monitoring Plan (Plan, p. 97) should be coordinated with the Arizona Department of Health Services. If a system exists for sharing water quality data, it should be described in the final monitoring plan.

Air Quality Comment

6 Several areas in the immediate vicinity of the Coronado National Forest are designated Nonattainment Areas for sulfur dioxide, carbon monoxide and particulates. While detailed discussion of this problem is not necessary at the Forest Plan level, EPA recommends that it be thoroughly evaluated in project level operating plans or environmental impact statements.

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION*

Environmental Impact of the Action

LO—Lack of Objections
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC—Environmental Concerns
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO—Environmental Objections
The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU—Environmentally Unsatisfactory
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1—Adequate
EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2—Insufficient Information
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3—Inadequate
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment

Agency response to
United States
Environmental
Protection Agency
Region IX

1a. We disagree with the EC-2 rating on the DEIS. EPA has not "...identified environmental impacts from the Proposed Action which should be avoided to protect the environment." EPA states that "...water quality and riparian habitat impacts from proposed management activities are not fully addressed." However, specific undisclosed impacts are not listed along with any supporting rationale as to why EPA believes such an impact will result. Management as proposed in the Forest Plan will result in both improved watershed and riparian conditions. Direction is included for compliance with the Safe Drinking Water Act and the Clean Water Act. The strategy for meeting the intent of the Clean Water Act is based on the use of site specific Best Management Practices (BMPs). The effects are shown in the DEIS with all watersneds and riparian areas being improved to satisfactory condition by the end of Period 5. (DEIS, pages 108-110) The idea of undisclosed environmental impacts is not compatible with the ultimate improvement in riparian and watershed conditions. We cannot address these implied impacts since EPA was not specific as to their nature.

1. We disagree. The Proposed Action uses management practices designed to reestablish effective ground cover and bring about improvement in overall watershed condition with all watersheds in satisfactory condition by the end of Period 5. Long-term productivity of all related resources is protected. (DEIS, pages 34, 109, 110) It is true that the alternatives vary in the amount of direct treatment. (DEIS, page 109) However, direct treatments affect less than one percent of the Forest acres in any Alternative but they are a significant factor in improving small localized problem areas, which are important in overall watershed condition. Direct treatments are very expensive and with limited budgets inclusion of more direct treatment in the Proposed Action would cause undesirable tradeoffs in other important resource areas. The Proposed Action improves watershed conditions and productivity and produces an acceptable level of environmental protection. It is stated on page 110 that all watershed will be in satisfactory condition by the end of the fifth period. This does not imply that every acre of all watersheds are in satisfactory condition, but sufficient areas of each watershed will have adequate cover so that the hydrologic response and soil productivity will be optimized. While all alternatives have advantages in some areas, they cannot be all alike.

2. The Standards and Guidelines suggested by EPA are already included in the Forest Plan. A detailed and stringent set of riparian management standards and guidelines were included on pages 44, 45, and 69 to 71 of the Proposed Action. These standards and guidelines will result in all riparian areas being in satisfactory condition by the end of the fifth period.

3. The Standards and Guidelines for prescribed burning and other fuel treatments are included in the standards and guidelines for each management area. For example, for MA2, the fuel management standards and guidelines appear on page 57 of the Proposed Plan.

4. Further discussion of the nature and causes of contamination in Harshaw Creek will be included. Potential impacts of proposed mining and associated road building are beyond the scope of a programmatic plan and must be addressed in project planning.

5. The monitoring plan has been coordinated with the State through scoping and review of the DEIS and Proposed Plan. However, EPA implies that the monitoring described on Plan, page 97 would be applicable for a water quality data system. The monitoring described on page 97 of the Proposed Plan is a survey procedure to monitor watershed condition by sampling percent ground cover. While the State would be welcome to share this data, we believe it has little direct utility to the Arizona Department of Health Services.

6. We agree that nonattainment areas off the Forest are beyond the scope of the Plan. However, air quality impacts will be evaluated in project level environmental analysis.

0396

September 13, 1985

U. S. Department of Agriculture
Forest Service Division
Forest Supervisor
Coronado National Forest
Federal Building
301 West Congress, FB42
Tucson, Arizona 85701

Dear Sir:

SUBJECT: PROPOSED BUNK ROBINSON WILDERNESS AREA

As a public citizen, I feel it is my obligation to reiterate--and want you to know--I am against putting the Bunk Robinson Area into a wilderness area.

There is such a delicate balance of "flora and fauna" in Guadalupe Canyon. By putting it into a wilderness thereby bringing more people into the area--it will be destroyed. Because it is an isolated area, with natural mountain barriers and land impassable by vehicles, the land is already well protected. Hikers and horsebackers are the only people that can get into the area, at the present time.

There are many possibilities to ruin the area, one being the poisonous plants now thriving just south of the border, whose seeds can be spread by birds, animals, and humans moving north. Should this happen, there is no way to exercise control on these vile plants, nor control the misery they can cause.

PLEASE VOTE "NO". Thank you.

Respectfully submitted,

Marguerite Vensel

Marguerite Vensel
Animas, New Mexico 88020

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
SEP 18 1985
RECEIVED

Agency response to Marguerite Vensel

Control of poisonous plants is possible in wilderness areas, under certain conditions; but greatly complicated by restrictions on the use of mechanized equipment and herbicides. Thank you for pointing out this aspect of the decision to us.

Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

0026

150 So. 36th Street
Boulder, Colorado 80303
1 August 1985

Forest Supervisor
Coronado National Forest
300 West Congress
Tucson, Arizona 85701

Dear Sir:

I have some comments on the Draft Environmental Impact Statement and the proposals on the planned use of the Coronado National Forest.

My comments are based on my experiences in the area and on the information you have supplied. I am an amateur ornithologist and nature photographer and have enjoyed my experiences in these special areas of Coronado National Forest many times.

It is my opinion that alternative "D" would best serve to preserve especially the zoological, botanical, and research natural areas. "Alternative D" would have minimum impact on the Mt. Graham Astrophysical proposal. Also, local employment and income would be slightly higher with alternative "D" than with the "PA."

The only condition that I find negative on the economy of the area would be a decline in fuelwood with alternative "D", compared with the "PA."

I feel strongly that the preservation of research natural areas and zoological botanical areas in Proposal "D" will attract a great number of tourists and nature lovers to the area, bringing much-needed income with them.

Respectfully yours,

Arthur E. Wainwright
Arthur E. Wainwright

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
AUG 6 1985
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Agency response to
Arthur E. Wainwright

Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will last at least ninety days as was the case with the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C, project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA

SEP 16 1985

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0342

3740 W. Ironwood Hill
Tucson, Arizona 85745
September 11, 1985

Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

Dear Supervisor:

Following are my comments on the proposed plan for the forest. In general, I believe that Alternative D would better serve the people of the area than the Proposed Action. As Southern Arizona continues to grow in population, our wide open spaces will become less wide and less open. The Coronado must stress even more than it does now the opportunity for us to retreat to a natural environment. Specifically, Alternative D would

1 --maximize new wilderness, while still allowing for other recreational sites.

--emphasize the preservation of nongame animals, including threatened and endangered species.

--restrict motorized vehicles to designated roads and trails.

--place appropriate limits on sawtimber and fuelwood harvests.

In addition, further steps should be taken to preserve the natural quality of the forest:

2 --Grazing should be reduced to the capacity of the range or below within one year. No grazing should be allowed in wilderness areas.

3 --Funds should be diverted from the reconstruction of roads (particularly the Mount Lemmon highway) to the purchase of private homes and lands within the forest.

4 --Ski resorts, tramways, and other "organized" forms of recreation should be discouraged.

Sincerely,

William Waller

William Waller

Agency response to William Waller

1. All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

   Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C, project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

   When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

2. Although we recognize a need for improvement, and plan tc correct problems; no justification exists for immediate removal of large numbers of cattle as you suggest. A more measured removal of excess numbers, coupled with improving range conditions will result in the same improvement of the land while still providing for this use of the National Forest resources. The Wilderness Act of 1964 and consequent wilderness acts specifically allow for livestock grazing as long as it is consistent with maintaining the wilderness values.

3. Funds for managing the National Forest System come from different appropriations funded by Congress based on specific laws. The diversion of funds as you suggest is not possible. The purpose of the Forest Plan is to develop resource management goals and provide direction to reach these goals. The Plan does provide direction to purchase private lands that may be suitable for public uses as well as direction for reconstruction of needed public roads. Funding for these activities is on a case by case basis.

4. The various laws governing management of the National Forest System provide for considering a wide range of recreational activities. Proposals for "organized" forms of recreation are considered where appropriate and a need exists.

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
[illegible]
RECEIVED

0599

1220 W. Las Lomitas
Tucson, Arizona 85704
8 October 1985

Mr. R. B. Tippeconnic, Forest Supervisor
CORONADO NATIONAL FOREST
300 W. Congress Street
Tucson, Arizona 85701

Re: Coronado National Forest EIS,
No. 0305-85-1

Thank you Mr. Tippeconnic:

For the summary of the above mentioned EIS. A brief review of the alternatives has created the following concerns:

1 1. Silviculture.

I note that there is no reforestation activity planned after timber is harvested. Natural regeneration will be emphasized. Is this in the best interest of renewing a resource that can be renewed?

2 2. Fuel wood.

Fuel wood will be available to residents of Mexico when not fully utilized by U.S. citizens. With the constant reminder that we are depleting our fuel wood supplies in the U.S., I do not understand how we can justify Mexico or any other foreign country to consume one of our natural resources. I suggest that fuel wood within the boundaries of the U.S. be retained for the exclusive use of the U.S. citizens.

3 3. Water rights.

I notice the application claims and registrations for wildlife water rights are pending. I do not understand this statement. Please clarify.

4 4. Minerals.

Impacts from prospect exploration and development on the public lands are not only difficult to predict but create under pressure of emergency requirements much destruction of public lands without timely reviews and plans of operation. I agree that there must be trade-offs in all negotiations but feel that there is still adequate areas on both BLM and private lands that can be developed for mineral entry without wholesale destruction of our natural forest.

5 5. Mt. Graham astrophysical proposal.

It is difficult to understand the justification for the anticipated construction of the massive astronomical facility on Mt. Graham.

5 Our astronomers and universities have already admitted that the many millions of dollars spent on Kitt Peak are a waste due to the light pollution from the exploding cities of Tucson and Phoenix. In spite of the clear non-light polluted air that Mt. Graham is currently enjoying I do not feel it is practical to spend more millions of dollars on Mt. Graham when we have the cities of Safford, Willcox, Thatcher, Central, Pima, etc. that are all clamoring for a piece of the exploding southwest population that will light pollute the air within 20-30 years to the point where the Mt. Graham facility will likewise be a waste of money. I feel that much more discretion should be used in spending our tax dollars. {See news clipping enclosed.}

6 b. Electronic sites.

Please advise the number of acres that the anticipated electronic site will occupy on West Peak in the Graham Mountains. Will this site consist of numerous steel towers and huge dishes?

Thank you for the opportunity to review and comment on the EIS. This is just one of the countless priveleges we enjoy in our U.S.

Sincerely,

Gene I Wendt

Gene I. Wendt

GIW/mb

Enclosure

9-10-85

Sun Belt states better prepare for growth explosion by 2000

By The Associated Press

WASHINGTON — The nation's population increase will continue to concentrate on the Sun Belt with just five states, including Arizona, accounting for more than half of all growth by the year 2000, a private economic research group says.

But while growth will remain focused on the South and the West, the National Planning Association also had good news for some Midwestern and Eastern states that have lost people in recent years.

Only West Virginia, the District of Columbia and New York state are expected to see population declines by 2000, the research group said. That contrasts with 1983 Census Bureau projections that anticipated declines in nine states and the District.

The Planning Association, an independent Washington-based research group, said California will add 6,668,000 people between 1980 and 2000 to lead all states.

The group said the combination of California, Florida, Texas, Arizona and North Carolina will account for 21,800,000 added people by 2000, or 54 percent of the nation's total additions.

(Arizona is expected to be the fourth fastest-growing state, behind California, Florida and Texas. According to the planning association, Arizona will gain 1,940,000 people by 2000. The Census Bureau predicts an even bigger leap, with 2,884,000 new Arizonans.)

Add Georgia, Washington, Colorado, Virginia and Tennessee to that list and the total is 27,518,000, or 68 percent of the expected national growth.

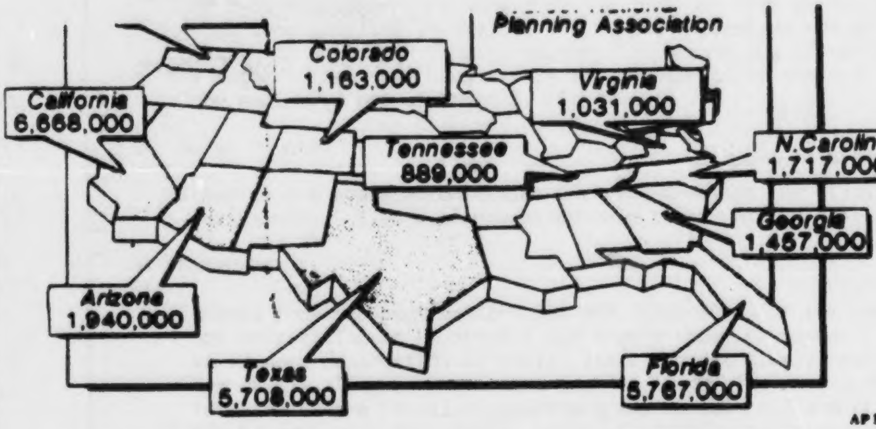
Even though growth continues to concentrate in the South and West, the report anticipated improvements in other areas, too.

For example, in the past, the planning association projected that Massachusetts would be the biggest gainer, adding 580,000 people, while Michigan was expected to lead the Midwest, adding 549,000.

In its most recent projections, issued two years ago, the Census Bureau had anticipated that Massachusetts would lose 246,000 people between 1980 and 2000, and Michigan would drop 50,700.

Planning association spokesman Carlton M. Strong said that while his group uses many of the same base

GROWTH, Continued Page 2A



AP Map

Growth will be focused on Sun Belt

From Page 1

figures as the Census experts, it places more emphasis on economic changes.

That likely explains the differences between Census and National Planning Association projections, he said. In addition, the private group has had the benefit of two more years of economic information to factor into its figures.

The Census Bureau projections were based on changes in birth and death rates and migration patterns, projected from the experience of the 1970s, according to its 1983 study.

Most of the differences in population growth among the states can be attributed to the migration of people responding to job opportunities, Strong said.

However, this varies considerably by age group, with the result that the population of people aged 65 and over is expected to grow more sharply in Arizona and Florida and to a much lesser extent in Illinois and New York. Larger differences between the Census and NPA figures was for Florida, and Strong said he was unsure of the reasons for the discrepancy.

The planning association anticipates that Florida will be second in growth by 2000, adding 5,767,000 people by then. Census experts had placed it first, anticipating growth of 7,000,000 by 2000.

Since the 1980 Census, however, Charles F. Longino of the University of Miami has documented an increase in what he calls reverse migration, with some retired elderly people choosing to go back to their states of origin after a few years in retirement. This factor may account for some of that difference between the two projections.

Pennsylvania was another state with a sharp difference, with the planning group calling for growth of 205,000 people, instead of the 659,100 decline projected by the Census Bureau.

The planning group called for New York state to lose 73,000 instead of the decline of 2.5 million the government had projected. And it said West Virginia faces a loss of 147,000, while the Census Bureau had projected an increase of 118,100.

Agency response to
Gene I. Wendt

1. The silvicultural treatments prescribed for managing timber lands of the Coronado National Forest will insure adequate natural regeneration. (See Management Area 2 of the Forest Plan). This is the reason the Plan predicts no artificial reforestation activities. In the event of a natural disaster such as fire or wind, artificial reforestation may be necessary, however, we have not predicted these occurrences as part of Forest planning.

2. It is our intent that fuelwood and other Forest products be reserved for use first by U.S. citizens. In some instances, there clearly is no demand by U.S. citizens to utilize available products because of various reasons. For example, small limbs are often left behind by U.S. wood cutters while Mexican citizens are willing to utilize them. In no case would the harvest of fuelwood or other products exceed the supply that could be sustained over the long term or be done in a manner where other resources would suffer.

3. The Forest Service has responsibility for management of wildlife habitat on the National Forest. One critical habitat factor is availability of water. We have applied for all necessary water rights for use by the resident wildlife. Authority to grant these rights to the Agency lies with the Arizona Department of Water Resources.

4. Minerals are fundamental to the Nation's well-being. The National Forest System by coincidence of geology and geography is a principal storehouse of minerals and energy. The search for and removal of minerals and energy resources are authorized uses of the National Forest System, to be encouraged and facilitated in accordance with the National Mining and Mineral Policy Act of 1970 and conducted in the public interest.

   The Forest Service objective is to carry out the mineral management mission in a fair and timely manner, consistent with multiple-use management principles, to integrate the exploration, development, and removal of mineral and energy resources with the use and conservation of other resources. The Forest Service will, through appropriate regulations and plans of operation, seek to minimize adverse impacts to other resources while fulfilling our mandate to foster mineral development.

5. Your comment(s) on the proposed Mt. Graham Astrophysical Area have been reviewed and are being considered in the development of a separate EIS for this project. Since the astrophysical proposal is being evaluated in a separate EIS, we can not respond at this time to the individual comments. We look forward to any additional comments you may have once the draft EIS is released for public comment. The public comment period will last at least ninety days as was the case for the Forest Plan EIS. We have included names of those requesting the Mt. Graham EIS on our list of those to receive the document. As a minimum, all persons commenting on the Mt. Graham proposal will be notified upon release of the draft EIS.

6. Although the Forest Plan and EIS identify potential electronic sites, including West Peak, additional site specific analysis will be required before they could be occupied. The current analysis only identifies them as being suitable for future electronic needs. The additional analysis would determine the extent and type of development that is compatible with other resource uses.

   Due to the physical nature of the West Peak site, we estimate only five to ten acres would be suitable for this type of use.

WESTAR
DEVELOPMENT
CORPORATION
4545 East Fifth Street Tucson, Arizona 85711 (602) 881-7214

0236

July 25, 1985

Mr. Alan Jaten, Head Ranger
U. S. Forest Service
Route 15, Box 277F
Tucson, Arizona 85714

Dear Alan:

1 Please accept this notice of our interest in developing a sky tram up the west face of the Catalina Mountains terminating in the vicinity of the Mt. Lemmon ski area. During the forest planning process, we respectfully request that you consider making land available for a tramway facility.

Sincerely,

Robert Shelton

RS:gjb

RECEIVED 9/6/85

Agency response to
Westar Development
Corporation

Management direction in the Forest Plan for much of the west face of the Santa Catalina Mountains does not preclude a tramway facility. One exception to this is the Pusch Ridge Wilderness Area. Any such specific proposal would involve conducting an environmental analysis and may require development of an environmental impact statement depending on significance of impacts or public controversy.

0707

Wildlife Management Institute

Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1808

DANIEL A. POOLE
President
L. R. JAHN
Vice-President
L. L. WILLIAMSON
Secretary
WESLEY M. DIXON, Jr.
Board Chairman

October 1, 1985

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT - 7 1985
RECEIVED

Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

Dear Sir:

The Wildlife Management Institute is pleased to comment on PROPOSED CORONADO NATIONAL FOREST PLAN and DRAFT ENVIRONMENTAL IMPACT STATEMENT, Arizona.

We commented in detail on the original plan in our letter dated March 15, 1983. The comments in this current letter are related primarily to changes from the original 1983 plan.

In general, we prefer Alternative D, watershed, recreation and wildlife, because of greater wilderness area and reduced commodity production.

1 The present plan provides better controls of grazing and fuel wood harvest than in 1983. Those were our principal objections in 1983 and we commend you for the changes made. The new section on riparian management in forestwide guidelines also is major improvement.

Some specific comments follow:

FOREST PLAN

2 Page 23, Wildlife and Fish: What are the "wildlife populations consistent with goals outlined in Arizona and New Mexico Department of Game and Fish Comprehensive Plans"? This would be a good place to show the appropriate goals in a table.

3 Page 23. Is this a high enough goal for range? (50 to 75 percent). An explanation is in order.

Page 24. Good statement on timber.

Page 26. Grazing will be in balance at least 20 years sooner than in original plan. That is good.

4 Page 40. Management area prescriptions need to be clearly separated from the management areas. They are confusing as presented.

Page 44. Du 32, E00. #3, a good statement on timber priorities.

Page 45. Good forestwide riparian statement.

Page 93. Specific tasks and costs estimates for the two state wildlife agencies to aid in monitoring are the best we have yet seen.

5 Page 116. A pp "C" has good wildlife and diversity standards.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

Daniel A Poole

Daniel A. Poole
President

DAP:slh

Agency response to
Wildlife
Management
Institute

1. We appreciate your continued interest and support in management of the Coronado National Forest. Your comments on the 1983 Draft Plan were used in development of the 1985 Draft Plan.

2. The wildlife population goals are shown in the Comprehensive Plans of the two State Game and Fish agencies. Since our primary responsibility is habitat management, we do not believe it is appropriate or necessary to repeat the population goals.

3. The Forest Service has long been known within the range management profession for a very conservative approach to range management and livestock stocking rates. Our colleagues at the universities and in other agencies often accuse us of an overly conservative approach. An example of this is the Forest Service adjective range condition rating. Forest Service condition classes are generally one class lower than other organizations. For example, a range classified as "Fair" condition by the FS could be called "Good" by most range management organizations. This is not a real difference in opinion about the condition, but merely a difference in terminology. The Forest Service, therefore, defines an acceptable situation as: "Fair or better range conditions, with a stable soil and a stable or upward trend."

   Ecological condition classes shown in the plan are an attempt to translate these range condition classes to the new terminology. We would agree that 50 percent of ecological potential is a rather low goal to set. At the upper end of the classification, 75 percent is more reasonable.

4. The prescriptions are intended to provide management direction for the specific areas of land (management areas) to which they apply. Therefore, it is not logical to separate them. The Forest-wide prescription applies to all areas of the Forest. The other prescriptions are specific to a given area as shown on the management area map.

5. The wildlife and diversity standards and guidelines in Appendix C have been incorporated into the appropriate management area prescriptions to increase the clarity of the management direction for wildlife in relation to other resources.

THE WILDLIFE SOCIETY

THE WILDLIFE SOCIETY, ARIZONA CHAPTER
2222 W. Greenway Rd
Phoenix, AZ 85023
942-3000 Ext. 254

CORONADO N. F.
OCT 25 '85

0788

October 9, 1985

Mr. R.B. Tippeconnic, Forest Supervisor
Coronado National Forest
300 West Congress Street
Tucson, Arizona 85701

Dear Mr. Tippeconnic:

The Arizona Chapter of The Wildlife Society has reviewed the
proposed Coronado National Forest Plan and Draft Environmental
Impact Statement. We commend the Coronado for the effort which
went into this endeavor and, generally, we support the proposed
action. Our major concern focuses upon riparian protection and
adequate habitat protection for fish and wildlife resources.
Overall, the Coronado seems to be sensitive to these issues, but
lacks adequate funding to implement comprehensive programs. As
with other U.S. Forest plans, the economics developed to justify
planned actions are biased in favor of commodity production.
Values established for both consumptive and nonconsumptive
1 wildlife uses are low and not in agreement with the values in the
draft RPA Environmental Statement or with expenditure values
listed in the 1980 National Hunting and Fishing Survey.

Our specific concerns relative to habitat protection as
outlined by the proposed plan are as follows;

- Fuelwood planning should be based on a 10,000 acre
2 compartment concept, as used on all other Arizona Forests. This
approach allows for Integrated Stand Management methodology on
the Coronado fuelwood sales. We also believe that an old growth
component is needed in the fuelwood prescriptions to assure
3 mature, contiguous stands of oak woodland for thermal cover and
cavity requirements of Management Indicator and Emphasis species.

- Reclaiming fuelwood roads should be a part of the managment
4 prescriptions in the Plan. We suggest establishing road
reclamation bonds and using K-V funds for that purpose.

- The oak woodland vegetation type is an important ecosystem
which deserves a conservative approach to fuelwood management.
5 The cut cycle in oak woodland drainageways should be on a 80-100
year average harvest schedule.

6 - The maps included with the DEIS and draft Forest Plan are

6 identical to those issued in the 1982 draft for the riparian areas. Either the maps should be corrected or a paragraph printed on the map that says not all riparian areas are depicted.

7 - We believe grazing level C or D needs to be applied with the understanding than any degradation of riparian in the 7A Management Area will result in enforcement of Level A (no grazing) grazing standards.

8 - New recreational development in riparian 7A zones should be avoided.

9 - The Proposed Action will have all riparian areas in satisfactory or better condition by Period 5, identical to the No Action, Alternative A (DEIS pages 18 and 19). Riparian areas are of critical value and are jeopardized in the State of Arizona. We believe all riparian areas should be in satisfactory or better condition by the end of Period 3, which is thirty years from now. We would consider satisfactory condition to include active regeneration of broadleaf trees in the 7A Management Area communities.

10 - 7A Riparian in Management Areas 9 and 14 should be managed at level "A" or level "D" grazing intensity, with the same standards and guidelines as prescription 7A. Those prescription guidelines which conflict with wilderness regulations would not be implemented. A commitment from the USFS that riparian areas in grazed portions of Management Areas 9 and 14 will be mapped is assumed. (Proposed Plan, page 14, Du 46, 11.) Any 7A riparian in Management Areas 9 and 14, which is being degraded due to grazing at grazing level "D", should be managed at grazing level "A".

11 - Stand management and sustained yield silviculture should not be a forest-wide timber objective on all suitable acres. The design and prioritization of any and all timber sales should be governed by wildlife, recreation, and visual resource objectives.

12 - No timber should be harvested along designated forest roads, except for safety, and visual resource objectives.

13 - The harvest targets for timber sales should be removed. The Coronado Forest has zero targets assigned by the RPA or Southwest Regional Plan. We see no justification for creating timber targets on the Coronado Forest.

14 - Any reference to "rotating wildlife openings" should be qualified with the statement that openings will rotate in

14 appropriate habitat types and where it is determined to be desirable for wildlife objectives.

15 The Arizona Chapter, TWS is also concerned about the commitment to monitor wildlife resources and the methodologies which will be used. Since the first publication of a Coronado Plan in 1982 and the development of a Management Indicator Species (MIS) list, methodologies for wildlife monitoring have changed significantly. Due to those changes, the assumptions and limits that influenced the selections for the MIS are no longer valid. Additional species should be added to the list, and those curently listed should be re-evaluated.

16 We believe that a new section needs to be added to the wildlife monitoring portion of the plan which outlines specific timelines for developing MIS habitat models and implementation of the R03 WILD computer program designed to monitor output changes.

17 A major failing of the Plan, we believe, is the absence of any methodology for tracking (monitoring) wildlife, and predicting wildlife response to various management decisions. Areas where this type of capability are most needed are: fuelwood and timber sale planning, fire prescription planning, recreation development, and minerals entry.

18 We strongly support the Coronado Forest and the proposed action for Off Road Vehicle enforcement. We encourage cooperative efforts among the appropriate State and Federal agencies to implement enforcement of O.R.V. regulations on public lands.

We also support the overall fire policy as described in the Proposed Action and DEIS. We commend the Coronado for instituting a liberal fire suppression policy within remote mountain ranges, including wilderness areas. 19 We also encourage the U.S. Forest Service to obtain authority to maintain habitats within Wilderness Areas to perpetuate populations of fish and wildlife.

We wish to commend the U.S. Forest Service for pursuing the RNA and ZBA programs. The Coronado Forest, in particular, has numerous areas worthy of the classification, and has vigorously promoted the program.

20 We support the RNA and ZBA recommendations of the Proposed Action, but we also think deserving areas have been omitted. Specifically, the following areas should be included as Zoological/Botanical Areas (ZBA's), Pine-Ramanote Canyons, The

20 Muleshoe Ranch Redfield allotment, and the High Peak proposal for Mt. Graham, as outlined in Alternative D.

21 We are pleased to note the commitment of the Coronado National Forest to bring grazing use in line with grazing capacity by the end of the second decade. We do not, however, feel that high intensity grazing management is necessarily in the best interest of other resource values. We encourage the Coronado Forest to further priortize the assignment of level D grazing, and where feasible implement level C grazing intensity as proposed in either Alternative C or D.

We offer the following specific comments for the D.E.I.S.

Page 17, Maximize Present Net Value

22 We suggest a sentence be added which identifies the benchmark model "Max PNV assigned values" as Alternative C in the D.E.I.S.

23 Page 23, Table 2. Management Options for proposed Mt. Graham Astrophysical Site

We believe the entire table, and all land allocation decisions listed in it, should be deleted and included with the Draft Environmental Impact Statement for the Steward Observatory Astrophysical Facility proposed in the Pinaleno Mountains.

Page 41, Table 5

24 Please explain how more acres are available for livestock grazing under the PA than alternatives C and D, but C and D achieve higher livestock capacities and use with fewer acres at level D intensity?

Pages 46 and 47, Tables 10 and 11

25 Costs are lumped as operation and maintenance and capital investment, but benefits are divided by resource category. We believe a table is needed to compare the costs to the dollar benefits in recreation, wildlife, and range.

Page 52, Proposed Action

26 The Proposed Action presents the highest opportunity costs under PNV analysis. It seems that some of the assumptions are faulty in the analysis. We do not understand why wildlife habitat improvement results in a revenue benefit output under

26 Alternative C, but the same activities for timber and fuelwood opportunities create a loss of revenue. It seems that there is a major error in the FORPLAN program, whereby hunting and fishing RVD's only track (increase or decrease) with activities flagged as wildlife habitat improvement or recreation site improvement. If the same activity is coded under Range or Forest Products, there are no hunting/fishing RVD outputs.

Page 64, Paragraph 2

27 "Both laws (PL 96-550 and PL 98-406) prohibited further consideration of remaining roadless areas as potential wilderness..." does not mean that the boundaries of the congressionally designated Wilderness Study Areas (WSA's) can not be expanded.

Page 84, Table 37

28 This table does not agree with Table 69 (page 116). Pine and Ramanote Canyons are listed in Table 37 and omitted in Table 69. Mt. Graham wet meadows are listed in Table 69 and omitted in Table 37.

Page 93 - 97, Wilderness

29 We believe none of the maps included with the DEIS allow the reader to locate with any assurance the various Wilderness Study Areas (WSA's). It would be helpful to have a map for wilderness analysis included in the packet. The map should include the proposed boundaries under each alternative. A case in point is Whitmire Canyon WSA. The text on page 95 does not locate the WSA for the reader, that information is on page 65. The text also states that the Whitmire Canyon WSA boundary would be slightly modified under Alternative C, but the boundary maps for Alternatives C and D are identical. Where, exactly, are the boundary adjustments under Alternative C?

Page 102, Range

30 Please define "Satisfactory range condition." The USFS rates range condition as very poor, poor, fair, good, and excellent. At what point on the rating scale is range considered "satisfactory"?

31 Please explain the statement "While there is only a slight difference in grazing impacts by domestic and wild animals, the partitioning of forage to livestock can conflict with wildlife use."

We are concerned about the methodology for the valuation of wildlife within the economic analysis in the DEIS;

1) The $16.90 value for a Wildlife-Fish User Day is unrealistically low (Table 4, Page 229).

2) Only the portion of time a hunter and/or fisherman spends actively hunting or fishing is given any value. The time spent driving, camping, resting, scouting, birdwatching, while on a hunting or fishing trip, is not assigned any value as a wildlife-related activity and apparently is not given any value in the recreation section of the Plan.

32 These combined effects greatly underestimate the value of wildlife-related activities, both in total and in relation to other uses. The ultimate effect of changing these values cannot be entirely forecast because of the complexity of the interactions in the FORPLAN model, but the effect would have to increase the value and importance of wildlife management and wildlife-related activities in the Coronado Plan. The Coronado National Forest Plan DEIS state "wildlife recration benefits were calculated as a weighted average of big game use, other game use and fishing use". All the values, except waterfowl hunting, for willingness to pay in the Draft EIS of the Resource Planning Act are well over the $16.90 figure used in the Coronado Plan (i.e. cold water fishing $22, warm water fishing $20, big game hunting $48, small game hunting $22, waterfowl hunting $15, upland game hunting $38) (Loomis and Sorg 1982). These values were reduced in the RPA DEIS, apparently to account for a difference between market price used for commodities and the willingness to pay used for wildlife. Although these values were reduced for questionable reasons and by questionable methods (see review of 1985 RPA Program prepared by CHEC for the Montana Department of Fish, Wildlife and Parks), it still produces a value of $19.00 per recreation day. In contrast to these low values, the 1980 National Survey of Fishing, Hunting and Wildlife-Associated Recreation, Arizona (USDI, USDC 1980), gives an average expenditure per day as $38 per fisherman and $34 per hunter.

Review of the Coronado National Forest Draft Forest Plan follows;

33 We found it difficult to track the management prescriptions for any given species through the maze of activities proposed in the Plan. The inventory process that established the present

33 nongame resource base of the plan does not follow FSM 2621.3 and report the amount, condition, and distribution of key habitats for Management Indicator Species (MIS). Likewise, there is no discussion of minimum viable populations for the unique and diverse wildlfie of the Coronado. This discussion is mandated by FSM 2621.2, and should address how a minimum viable population is determined and management requirements to maintain this population level.

Specific Comments

Page 9, Table 1

34 We recommend the addition of footnotes that define MAUM, MRVD, MCF, MBF and MAcFT. The glossary of terms is only in the DEIS. Terminology in the plan should be defined within the document.

35 Please explain the 348 and 408 figures for grazing capacity "supply". The maximized range and RPA benchmarks in Table 9 of the DEIS (page 44) are 348 and 406 for capacity and 357 - 406 for permitted use. Those figures do not represent "supply" of anything, as they are achieved without multiple-use considerations or monetary constraints. The same criticism applies for all other headins. We believe the column should be relabled "maximum benchmark outputs".

Page 11, Paragraph 5

36 We recommend the deletion of this paragraph, as the Mt. Graham astrophysical analysis will be addressed in a separate EIS.

Page 13, Wildlife and Fish

37 We recommend the deletion of the paragraph about management indicator species. The process used to select many of the species is no longer valid, based upon the new Forest Regional direction to develop wildlife habitat coefficients for managment indicator species.

Page 16, Timber and Firewood, Expected uture Condition

38 The second paragraph states an objective to "...support local dependent logging and lumber industries." and "...encourage and support new fuelwood industries." There is no discussion within the DEIS that evaluates the impacts of such activities. At first glance, the encouragement and support of fuelwood and

38 lumber industries would seem to be at conflict with the next paragraph, which says wood harvest will be used to "...meet recreation, visual, and wildlife goals."

Page 23, Mission

39 We recommend striking "...and sustained yield..." from the mission statment.

We believe the last sentence should read "Management programs are to be oriented to maintain cultural values, recreational opportunities and wildlife habitats". It is our opinion that cultural values would include "rural economics" as well as urban cultural orientation.

Page 42, DU 10, 1.

40 The prescription refers the reader to Appendix J for, one assumes, guidelines to "Maintain occupied habitat of commonly hunted species, listed threatened and endangered species, and management indicator species...". Appendix J omits all fish species, desert mule deer, javelina, black bear, scaled and Gambel's quail. The heading for Appendix J says "Minimum Habitat for Indicator Species". Federal threatened and endangered species may not be managed for "minimum" habitat.

This management practice should not opt for mere maintenance of habitat, but should allow for habitat improvement/enhancement for MIS/threatened and endangered species after research more accurately prescribes habitat requirements.

Page 45, DU 34 and 46, 11.

41 We believe all riparian areas should be in satisfactory or better condition at an earlier date than 50 years. We recommend that this condition should be achieved within 30 years (by the end of period 3).

Page 49, DU 50, Number 3

42 We recommend adding "...and trails" after the word roads.

Pages 52, 55, 59, 63, 65, 70, 72, 76, 78, 81, 85; DU 1

43 We recommend that all wildlife and fisheries standards and guidelines be printed under the Management prescription, not referred to an Appendix.

Page 67, DU 19,21, 60, 1.

44 We question the management to sustain an average 40 to 50 year cutting cycle in oak woodlands, where the cycle should be 80-100 years.

Page 73, DU 19, 21, 60, 1.

45 We recommend the cutting cycle average be changed to include the following:...except in oak woodlands, where the cycle will be 80-100 years. A minimum of 40% of the trees will be "old growth" (240 + years) within the sale area."

Page 79, DU 33, 34

46 We believe a 3rd standard and guideline is needed. "Watershed treatment upstream of this management area is a high priority to protect area from siltation and other adverse watershed impacts." Sycamore Canyon in the Atascosa Mountains is in specific need of this type of protection.

Page 95, ange 2, 4. requency

47 If allotments are monitored at the rate of 5% each year, then there will be 20 years between monitoring efforts. The DEIS states the 20 years is the maximum allowable time that should expire between monitoring efforts. If most allotments are to be managed at level D, then 10% of the allotments per year should be monitored, at a minimum.

Page 113, Appendix B

48 The management practices should include a separate category for MIS and treatened and endangered species, which should be incorporated into the management prescriptions applicable to all areas of the Forest (pages 40-51). The activities in Appendix B should include MIS and threatened and endangered coordination to allow agencies to scope the research needs of these species so that more specific habitat components can be prescribed.

Pages 116-126, Appendix D. Wildlife and Plant Diversity Standards and Guidelines

49 We believe the standards should be written out completely for each prescription. By the time a reader gets to prescription 14, the standards reference back through a maze of previous prescription guidelines.

Page 116, Standards, 1. a. (3) c. (1)

50 We suggest a rewrite to read: "Retain 20% of the tree canopy in mature or old growth age classes. The average age of the stand in drainage ways will be managed at 180 years old, minimum. The reference for this change is Wildlife Coefficients Technical Report, August 1984, K. Byford, et. al. U.S.D.A. Forest Service, page 5.

Page 118, 1. a. (3) c. (9)

51 We recommend the addition of a second sentence. "In turkey and Mearn's quail habitats, lop and scatter the slash."

Page 118, 1. a. (3) d. (2)

52 We recommend the addition of a second sentence. "Roads will be reseeded and contoured to return to an original, preroad, condition".

Page 118, 1. a. (3) e. (1) (d) 1.

53 The wildlife fence specification should also state that the bottom wire of the fence will be "twisted barbless wire".

Page 119, 1. a. (3) f. (2)

54 Same comment as page 118, 1. a. (3) c. (9).

Page 119, 1. a. (3) g. (1)

55 We recommend "a." be changed to: "inspect all water developments, other than springs, annually and maintain as needed. Inspect and maintain springs at least once every 4 years".

Page 120, 1. h. Timber

56 We recommend the addition of "2(a) ponderosa pine type will have at least 14 overstory trees/acre which exceed 20 inches d.b.h. 2(b) mixed conifer type will have at least 16 overstory trees/acre which exceed 24 inches d.b.h."

Page 121, 1. h. (13) (a) Gambel's oak

57 There should be no cuts in Gambel's oak unless absolutely necessary. The standard should read: "Retain at minimum 60% of tree canopy cover (compared to total enclosure) as mature and old growth; less than or equal to 20% as poles; and less than or

57 equal to 20% as seedlings/saplings".

Page 122, Objective

58 Maintain horizontal and vertical plant diversity.

Page 123, Objective 3.

59 We recommend a change to: "Manage fuelwood stands at a 80-100% level of occupied habitat (compared to untreated stands) for Mearn's quail and primary and secondary cavity nesters. Manage ridge-nosed rattlesnake occupied habitat at a 100% level".

The Arizona Chapter, T.W.S. appreciates the opportunity to review these documents. We trust our comments will assist the Coronado National Forest in its effort to develop a comprehensive land management plan.

Sincerely,

Bruce Jones, President
Arizona Chapter
The Wildlife Society

BJ:VCS:sr

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1. General Comment:

The economic analysis procedures used are unfairly biased in favor of commodity production. Benefit values assigned for wildlife-related activities are significantly undervalued.

Specific References:
Page 6

- "The $16.90 value for a Wildlife-Fish User Day is unrealistically low..."

- "Only the portion of time a hunter and/or fisherman spends actively hunting or fishing is given any value. The time spent driving, camping, resting, scouting, birdwatching, while on a hunting or fishing trip, is not assigned any value as a wildlife-related activity and apparently is not given any value in the recreation section of the Plan."

- "All the values, except waterfowl hunting, for willingness to pay in the Draft EIS of the Resource Planning Act are well over the $16.90 figure used in the Coronado Plan..."

- "Although these values (RPA values) were reduced for questionable reasons and by questionable methods...it still produces a value of $19.00 per recreation day."

- "...the 1980 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation, Arizona...gives an average expenditure per day as $38 per fisherman and $34 per hunter."

General Response:

We do not agree with your statements concerning wildlife benefits and the computation of user days.

a) The view that gross expenditure estimates should be equivalent to benefit values in efficiency analysis is incorrect. Our conclusion is based upon the well-documented support for our position found throughout the economics literature on this subject. Much of the current literature on the subject draws from a well-known, landmark study funded by The Arizona Fish and Game Department more than ten years ago (see Martin, et. al. 1974, Project FW-11-R). This publication contains an excellent summary of the "consumer surplus" valuation approach used by the Forest Service as well as an explanation of why expenditures are inappropriate as benefit value estimates.

b) The procedures the Forest Service used to compute wildlife user days are well established and have not changed for several years.

Before responding to specific points, we would like to briefly explain the procedures used to arrive at the benefit values and the number of wildlife user days.

Basic Definition of Economic Value:

Economic value for recreation used in Forest Planning is based upon the net amount, in excess of their actual expenditures, that consumers are willing to pay for a resource. In conventional economic theory, this value is called "consumer surplus." Net willingness to pay, or consumer surplus, is the standard measure of value in benefit/cost analysis performed by the U.S. Forest Service, the U.S. Army Corps of Engineers, the Bureau of Reclamation, the Soil Conservation Service, the Bureau of Land Management, many State government agencies, and others.

The most commonly used technique for estimating users' net willingness to pay for recreation is the "Travel Cost Method." A brief description of this technique will be used to illustrate the concept of consumer surplus. The "Travel Cost Method" relies on variations in travel costs of recreationists to trace out a demand curve for a

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particular type of recreation experience. The demand curve is usually downward sloping and to the right of the origin, depicting an inverse relationship between quantity demanded and price. The total area under the demand curve may be thought of as the *total*, or *maximum*, willingness to pay ("total benefit"). In order to arrive at a *net* benefit value, the consumer's travel costs must be deducted from this total benefit measure. The area under the demand curve, but above actual travel costs, is a measure of *net* willingness to pay, or consumer surplus. As can be seen, consumers' actual expenditures do play a role in this estimation process; however, they are a part of the "*cost*" side of the equation, *not* the net "*benefit*" total.

Based upon this kind of valuation concept, the use of actual expenditures by hunters and fishermen is *not* appropriate as benefit values for valuation of wildlife. Expenditures are useful only for measuring the effect of impact on local economies of some resource management action. The reason for not attributing the indirect spending impact as part of the value of recreation is that the recreationist would have spent his money doing something else (or simply saved it), with an equal indirect impact somewhere else. The impact of the recreationist's expenditure on the local community is thus a transfer of spending from one place to another rather than a net addition of value. Use of gross expenditures as a measure of value would actually lead to maximizing *inefficiency* instead of efficiency. That is, if gross expenditures were used as a measure of value, new recreation sites would be located as far away from population centers as possible, so that people would have to incur large expenditures to get there.

The following brief list of references provide additional detail on this concept of "economic value."

Brown, Thomas C. 1982. Monetary Valuation of Timber, Forage and Water Yields from Public Forest Lands. U.S. Department of Agriculture, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado. General Technical Report RM-95.

__________. 1984. The Concept of Value in Resource Allocation. Land Economics 60(3): 231-246.

Donnelly, Dennis M., John B. Loomis, Cindy F. Sorg, and Louis J. Nelson. 1985. Net Economic Value of Recreational Steelhead Fishing in Idaho. U.S. Department of Agriculture, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado. General Technical Report RM-9.

Hansen, Christopher S. 1977. A report on the Value of Wildlife. U.S. Department of Agriculture, Forest Service, Intermountain Region, Ogden, Utah.

Martin, William E., Russell L. Gum, and Arthur H. Smith. 1974. The Demand For and Value of Hunting, Fishing, and General Rural Outdoor Recreation in Arizona. Technical Bulletin 211. The Agricultural Experiment Station, University of Arizona, Tucson.

Rosenthal, Donald H., John B. Loomis, and George L. Peterson. 1984. The Travel Cost Model: Concepts and Applications. U.S. Department of Agriculture, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado. General Technical Report RM-107.

Ward, Frank A. 1982. The Demand For and Value of Recreational Use of Water in Southeastern New Mexico. Research Report 465. The Agricultural Experiment Station, New Mexico State University, Las Cruces.

Calculation of Benefit Value for Coronado:

The $16.90 value for hunting and fishing used for the Coronado is the result of a calculated weighted average using established RPA benefit

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values for big game use, small game use, and resident fishing use. The nongame wildlife use value of $22.76 is taken directly from the RPA estimates. The benefit values used are those in use for the 1985 RPA Program as of October, 1983. The use of these benefit values is mandated by National Forest Service policy. The weights used are taken from the 1980 Arizona Game and Fish Department data. The base data and calculations are shown below (the one cent difference in totals is apparently due to rounding differences).

	1985 RPA Benefit Value (Jan. 1, 1982 $)	Benefit Value (4th 1980 $)	Percent of Use	Weighted Values
Big Game	30	27.31	19.2	5.24
Small Game	18	16.39	46.1	7.56
Fishing	13	11.85	34.7	4.11
		Weighted Benefit Value		16.91

The nongame wildlife use uses the RPA benefit value of $22.76 ($25 in January 1, 1982 dollars). The overall result of using these benefit values can be calculated using the total wildlife outputs (Table 9, p.44, DEIS) and the total wildlife benefits (Table 11, p.47, DEIS). For the Proposed Action alternative, the average wildlife benefit value is $18.52 in 1980, 4th Quarter Dollars. Other alternatives are only slightly different.

Brief Description of Wildlife-Fish User Day Concept:

The primary method used to estimate wildlife and fish user days is State game and fish statistics. Under existing Forest Service policy, an RVD is twelve hours of a particular activity on the Forest by one person. Thus an individual's fishing trip of three hours' duration with one hour spent picnicking or hiking and the remainder actually fishing would be estimated as 1/6 of an RVD fishing (2 hrs./12 hrs.) and 1/12 of an RVD picnicking or hiking (1 hr./12 hrs.). Obviously, under this system, the amount of time spent by the individual packing his lunch at home, tying his flies or purchasing bait, or driving to the Forest boundary is not included in the RVD estimate. Hopefully, however, the total amount of time spent recreating on the Forest is captured somewhere in the Recreation Information Management (RIM) system. The benefit values used in Forest planning are based upon the same notion of a twelve hour RVD of a particular activity. Thus, the benefit values for hunting, fishing, developed recreation, dispersed, etc. are all different (for example, a big game RVD is valued about three times more than a picnicking RVD). Admittedly, the present Forest Service system (RIM) is cumbersome and abounds with measurement problems; however, short of actually counting every Forest visitor, it is unlikely that some other, better system could be implemented by an individual National Forest. It is appropriate to point out that this is the same procedure used by the Forest Service throughout the Nation.

The fact that the Coronado attempts to estimate wildlife user days based upon the amount of time actually spent on the Forest engaging in that particular activity is the result of long-standing Forest Service policy and is the basis for our benefit estimations as well. If we did not make this distinction, we might indeed show a greater number of wildlife user days; however, we certainly would not apply the same benefit value as for hunting and fishing alone. The amount of time spent by users not actually hunting or fishing is accounted for by our estimates of developed or dispersed recreation (even time spent driving on Forest Service roads is included in our dispersed estimates).

Specific Responses:

On p. 6 of your detailed comments, you state that "the $16.90 value for a Wildlife-Fish User Day is unrealistically low." We do not agree.

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As shown earlier, this value was calculated using the established RPA benefit values and the actual Coronado estimates for wildlife use. The actual average value in the Coronado analysis per user-day is about $18.50. In addition, it was explained earlier that the expenditure estimates (which may be quite high) are not comparable to the benefit values.

Also on p. 6 you state that "only the portion of time a hunter and/or fisherman spends actively hunting or fishing is given any value." As explained earlier, this is incorrect. The procedures used by the Coronado are an attempt to account for all recreation time spent on the Forest. Time spent actually hunting and/or fishing is valued at about $18.50 per day; developed recreation is valued at about $8.60 per day and dispersed recreation is valued at about $11.43 per day.

Elsewhere on p. 6 you point out that the benefit values used are smaller than some of those shown in the 1985 Draft RPA EIS. The table which you are apparently referring to does not contain "benefit" values and is not labeled as such. The benefit values used for the Coronado are clearly identified in Table F. 2 of this document. As demonstrated earlier, the values in Table F. 2 were adjusted to 4th Quarter 1980 dollars and used in the Coronado FORPLAN model. No other adjustments were made by the Coronado.

On p. 6 you state that RPA values "were reduced for questionable reasons and by questionable methods." Apparently your comments are directed toward the procedure used to estimate the wildlife program benefit values for the 1985 RPA program (as shown earlier, the Coronado's were estimated using these established 1985 RPA values). In our opinion, this claim is groundless. The wildlife values estimated and the procedures used for the 1985 RPA Program are clearly outlined in the EIS for the 1985 RPA (January, 1984). The values and the rationale used are shown in Appendix F of this document (see especially pp. F-10 through F-12). The use of qualified professional judgment to establish these benefit values is in no way "arbitrary" in a legal or professional sense.

On p. 6 you note that gross expenditure estimates are higher than the benefit values used in the Forest Plan. As pointed out earlier, the belief that expenditures should be equivalent to the benefit values in efficiency analysis is not supported by conventional economic theory.

Also on p. 6 you state that the benefit value used should be at least $19 per recreation day. As shown earlier, the value used for the Coronado was calculated correctly. The value used on the Coronado is approximately $18.50 per user day.

Summary Conclusions:

In summary, our review of the procedures and actual values used to estimate the wildlife recreation benefit values for the Coronado National Forest does not indicate a need to revise these values. While it is true that the benefit values used for the Coronado are based on the established 1985 RPA Program benefit values, no convincing evidence has been offered which would indicate that these values are unreasonable or inappropriate. The procedures and values used by the Coronado National Forest are consistent with the direction used throughout the National Forest System. Based upon our review, we must conclude that the benefit value used is appropriate and was estimated based upon a correct interpretation of the procedural instructions issued by the Regional Office.

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In addition, we have reviewed the RVD estimates used for the Coronado and have concluded that the procedures used were appropriate in terms of existing Forest Service policies Nation-wide. Our review does not indicate a need to revise these calculations. No convincing evidence has been offered which would indicate that these values are unreasonable or inappropriate.

2. We agree that the planning of fuelwood sales should be done on a "compartment" concept. The terrain found on the Coronado does not allow for large continuous areas of suitable fuelwood stands. Therefore, a 10,000 acre standard may not be applicable to our situation. The size of each compartment should be relative to all resource needs, including wildlife. For instance, a major drainage might be a suitable compartment for planning.

3. An old growth component is included in the fuelwood prescriptions by revision of the wildlife and plant diversity standards and guidelines. See response number 50.

4. We agree. The direction for this is found on page 118 of the Draft Forest Plan. Additional direction is found under DU 1 and DU 48 of appropriate management areas. The use of bonds or KV funds to accomplish this is often done, however, these are administrative procedures and do not belong in a resource plan.

5. We agree that the oak woodland vegetation type is an important ecosystem and believe that our planned approach to fuelwood management gives proper emphasis to maintaining this ecosystem. Fuelwood harvest is only one management tool to be used in conjunction with others such as prescribed burning.

   The cutting cycle of 40 to 50 years proposed in the Forest Plan is based on past experience with regrowth of oak species. A cutting cycle is the average time between entries into a particular stand of trees for some sort of harvest treatment. It does not represent the rotation age of the species being featured. We would agree that the rotation age for woodland species is 80 to 100 years or even longer. Since research is lacking for the oak woodland of Arizona, we have not identified a rotation age. A correlary to fuelwood management is the 20 year cutting cycle often used for ponderosa pine with a rotation age of 120 years.

   We do not believe a longer harvest schedule is necessary for drainageways because an old growth component is recognized in management of the fuelwood stands.

6. Maps for the Final Forest Plan have been updated to include additional riparian areas that have been identified and field checked since the initial Draft Plan. Any additional riparian areas that have not been identified, verified, and mapped at this time will be added later. Implementation direction on page 39 of the Draft Plan provides for applying the proper management direction in instances where mapping is inadequate. We do not believe a notation on the maps is necessary.

7. This understanding is included within the direction for range management practices for Management Area 7.

8. We agree in principle. However, specific recreational development proposals should be analyzed on their own merits keeping in mind the primary objective is to perpetuate the riparian dependent resources.

9. The length of time necessary before 100 percent of the riparian area will be in satisfactory condition is due to the time needed for woody riparian vegetation to recover.

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A riparian area is considered satisfactory when at least 60 percent of the woody plants are in three or more species; three age classes are represented with at least 10 percent in sprouts and seedlings; and at least 60 percent of natural cover is maintained. Since riparian areas that are now unsatisfactory usually are lacking the young age classes of woody vegetation, it will take about 30 years to establish the two younger age classes once uses are controlled.

The Forest Plan prescribes that at least 25 percent of the riparian area will be in satisfactory condition by the end of the Second Period and that the percentage in satisfactory condition will increase each year. The statement that 100 percent will be satisfactory by the end of Period 5 does not mean we will wait until then to make improvements.

10. We have added additional direction in Management Area 9 to prescribe that riparian areas will be grazed under intensive management or not at all. All management areas have been mapped to show the various capability area types, including riparian types. These are available to the resource managers and are an integral part of deciding on the correct standards and guidelines to be applied. See implementation direction on pages 38 and 39, Draft Plan.

11. Timber harvest on the Coronado N.F. is done primarily to benefit wildlife, recreation, and visual resources. See timber harvest objective (DU 19 and 21) on page 55 of the Draft Forest Plan. Sustained yield should be an objective within constraints imposed to meet the stated management emphasis. Sustained yield of any resource does not necessarily mean harvesting the maximum potential.

12. We believe the stated timber harvest objectives and guidelines are also appropriate for scenic areas, such as along forest roads.

13. The timber yields shown in the Draft Plan and DEIS are not intended as "targets" but as estimated yields resulting from the proposed management direction. Targets have not been assigned to the Coronado in the past because the suitable timber lands have been considered "unregulated." We recognize these yield estimates have a way of becoming targets. This is one reason the timber sale plan (Table 18 Draft Plan) only shows a harvest that is based on current sawmill capacity.

14. Existing meadows are not part of the suitable timber land base. They will be maintained as meadows. The timber harvest practices will create additional openings on a rotating basis.

    We have added additional wording to timber harvest guidelines for Management Area 2 to satisfy your concern about wildlife openings.

15. Although the Forest Plan suggests methods to monitor responses of wildlife populations and habitat, the primary purpose is to identify species and activities to be monitored and the points at which management direction needs to be evaluated and changed if necessary. Monitoring methods listed are those currently available to us. As new methodology is developed, including habitat capability models, we plan to adopt any that meet the needs and are efficient.

    Early in the Coronado N.F. planning process all interested wildlife managers were invited to participate in the selection of indicator species. Participants in this process included representatives of Arizona Game and Fish, U.S. Fish and Wildlife Service, the University of Arizona, Tucson Audubon Society, the Nature Conservancy, and Forest Service Wildlife Biologists. They agreed on a list that seemed appropriate at the time.

    The list of management indicator species will be reviewed and updated concurrent with the wildlife monitoring and evaluation. Some attempt was made to define minimum viable populations in terms of defining currently occupied habitat. For many species, habitat and population data was limited.

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16. We disagree. The monitoring plan already suggests that modifications to monitoring techniques may be necessary. See item 8 Evaluation in the wildlife monitoring section. To suggest timetables for specific models or computer programs is unnecessary given todays rapidly changing technology.

17. Again we disagree. The monitoring plan provides for monitoring certain indicator species and their habitats to determine the effects of various management activities. While the selected indicator species may prove not to be the most desirable, the commitment is there to revise the list and techniques for monitoring purposes. Also some of the specific activities, such as timber and fuelwood harvest, are scheduled for monitoring of the applied management prescriptions.

18. Thank you for the support of our proposed motor vehicle management policy.

    The purpose of the planned policy is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

    The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

    Signing or designation of roads or trails open to vehicular use would be by route markers. The intent of this is to use a signing system already established for the purpose of informing the public where they are traveling and which roads or trails are being maintained as part of the National Forest transportation system. Route markers now exist on many roads throughout Arizona and New Mexico National Forests. We recognize there is much work yet to be done to sign all roads and trails. For this reason, total implementation of the vehicle use policy will take three to four years for the Coronado N.F. However, by establishing the policy now, we feel current and future resource damage can be reduced because people will know that off the road use of vehicles is not acceptable. Direct enforcement of the policy will have to be implemented in stages along with the signing.

    Regardless of a given vehicle management policy, we recognize there will always be some individuals who will disregard established regulations. Teaching responsible use of the National Forests and its resources is something every individual can assist us with. Enforcement of the policy will also require a cooperative effort between agencies, organizations, and individuals.

19. Recent charges have been made in the Forest Service fire management policy for wilderness areas. Prescribed fires may now be used to enhance wilderness values including habitats for federally listed T&E species; to reduce fire hazards; and to permit lightning to more nearly play its natural ecological role. This direction is given on page 83 of the Draft Forest Plan.

20. We agree that identification and designation of appropriate RNAs is important and believe the Coronado N.F. can be justifiably proud of leading the Southwestern Region in that effort. We have more RNAs than any other Forest and with our proposed additions, will have represented all targeted types on this Forest.

    Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually preclude or severely restrict most resource uses, including recreational activities.

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We have carefully reviewed all proposed Research Natural Areas and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out each special area. We recognize that the entire National Forest is a unique place and worthy of special care.

It is important to bear in mind that the RNA program is national in scope and not limited to National Forest lands. It is not necessary or even desirable to have every vegetative type within the Coronado N.F. represented by RNAs on this Forest. Better representatives may well exist elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

Zoological and/or Botanical Areas have been proposed for areas where truly unique biological resources are in need of special management emphasis to accommodate public use and enjoyment of them. Most of the Coronado is biologically unique and our overall management emphasis is aimed at preservation of these qualities of the land. The ZBA designation has been reserved for those special areas where more than ordinary management emphasis is required. Such areas are identified in the plan, and others were considered as suggested by various respondents.

The question of a zoological/botanical area for the spruce-fir forest on Mt. Graham will be addressed in the EIS being prepared for the astrophysical proposal.

Pine-Ramanote Canyon (Atascosa Mtns.) - We agree these areas need further evaluation and plan to do so with interested parties in the next planning period. Our initial evaluation is that these areas are not highly unique, are highly inaccessible and are not currently threatened by current or anticipated future use. In cases such as this, special designation which calls attention to the area might be more of a threat to unique values because of increased public use. This phenomena has happened in several other special areas and increased activity threatens to destroy the values they were established to protect.

Redfield Canyon (Galiuro Mountains)
Most objectives of classifying the Redfield Canyon watershed as a Zoological/Botanical Area can be accomplished through application of management prescriptions for the Galiuro Wilderness. The only concern which is not addressed by wilderness classification is the need to close the area to grazing. We agree that a combination of economic and ecological factors makes it impractical to graze the Redfield Allotment, and this is reflected in the final Coronado Plan.

21. Only 50 percent of the total suitable rangeland has been proposed to be managed under level D management by the Forest Plan. Priority for this level of management will be the more productive allotments. The rest of the suitable rangeland will be managed at lower intensities, including B, and C, depending on the actual suitability of a given allotment and other resource needs. Level D range management is more intensive in regard to the actual management of livestock and does not necessarily imply more intensive use of forage by livestock.

22. The benchmark alternative known as Maximize Present Net Value with Assigned Values is not exactly the same as Alternative C. The benchmark was modified slightly to become Alternative C and they are very similar. This relationship is noted on page 20 of the DEIS.

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23. All tables and narrative discussions related to allocation decisions for the proposed Mt. Graham Astrophysical Area have been deleted in the FEIS and Final Forest Plan.

Management decisions for the Pinaleno Mountains have been made for all areas not directly affected by the proposed Mt. Graham Astrophysical Area. The only area directly affected is the 3500 acres originally proposed by Steward Observatory. Management direction for this entire 3500 acre area will be addressed in the Mt. Graham Astrophysical EIS. That EIS will contain a range of development as well as nondevelopment options, including wilderness for roadless areas within the 3500 acre area. Standards and guidelines developed from the analysis documented in the Mt. Graham Astrophysical EIS will be incorporated in the Forest Plan when the decision on land use for the 3500 acres is made.

The allocation decision for the Mt. Graham Wilderness Study Area is being made in the Forest Plan. The Forest Plan was revised to recommend wilderness for all 62,000 acres of the WSA. Our analysis and public comment now indicates there are no conflicts between this wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development.

24. In review of your comment we found some errors in Table 5, of the DEIS regarding range management levels. This same information was shown in more detail in Tables 4 and 54, DEIS. The corrections have been included in new Tables 3, 4, and 54 of the FEIS. These errors were due to incorrect human interpretation of management prescription allocation and was not the result of basic errors in the planning model (FORPLAN).

Information contained in new Tables 3, 4, and 54 of the FEIS show the PA with approximately two percent (23,000 acres±) more acres available for grazing.

The PA also has approximately three to four percent less grazing capacity and use than do Alternatives C or D by the fifth period. The difference in the first period is less than one percent.

The difference in grazing capacity and use, especially by the fifth period, is primarily due to more acres grazed at Level B in the PA than Alternatives C or D. The forage available to livestock (capacity) under Level B management is substantially less by the fifth period than is true for management Levels C or D. This is based on prior knowledge that budget constraints placed on other alternatives, such as Alternative D, result in additional allocation of low management intensity prescriptions. These low intensity prescriptions in turn result in substantially lower costs and resource outputs such as grazing use or capacity.

By the fifth period, livestock use and forage available to livestock (capacity) are the same. More Level D management is prescribed in the PA than Alternatives C or D and is concentrated in the more productive and efficient rangelands in an attempt to offset the differences in capacity and use because of reduced grazing use (and related costs) on less efficient rangelands. This effort does not totally offset the three percent difference in total capacity.

We recognize this may not be a total answer to your question. Because of the complexity of the planning model there may be other interactions affecting these differences such as grazing capacity variations between ecosystems shown as suitable rangeland in different alternatives.

The model seeks economic efficiency based on total costs and benefits assigned to each management prescription and not on separate resource components, such as range management costs. The total estimates made regarding management levels and use or capacity are predictions of applying the various management prescriptions. These estimates are, of course, most accurate for the first period (Plan period) and much less reliable by

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the fifth period. As implementation and monitoring take place, the most effective and efficient application of the range management component of these prescriptions will be sought on individual areas, whether it be Level A, B, C, or D range management intensity. This is the intent of the range management standards and guidelines of each Management Area.

25. The purpose of Tables 10 and 11, DEIS was to compare one alternative to another in relation to their costs and benefits. Table 12, page 49, DEIS, has a comparison between discounted benefits and discounted costs by the categories you suggest.

26. All wildlife benefits are shown as wildlife RVDs whether they accrue due to direct wildlife habitat improvement or to indirect improvement from fuelwood harvest or rangeland improvement. The direct values used for fuelwood or timber products only include the actual product value in terms of wood volume sold. The wildlife or recreational values of wood harvest are included within total RVDs from all sources. The RVDs and other resource outputs are tied to each total multiple use prescription.

Because of this one must use some judgement in comparing individual resource benefits and look at total benefits of a prescription or alternative.

Alternative C provides for a substantial amount of direct wildlife habitat improvement which results in increased wildlife benefits (RVDs). The reduced timber and fuelwood harvest in Alternative C does reduce the wildlife RVDs but not enough to offset the increase. Timber and fuelwood harvest only affect, at best, less than one percent of the total Forest acres in any one year.

27. Since the Wilderness Study Area boundaries were developed by input from many parties, it is our position that the intent of Congress and the public was not to study wilderness options for roadless areas outside these boundaries unless there was sufficient reason to do so. We also took this intent to mean roadless areas adjacent to the WSAs.

28. Thank you for pointing out the inconsistencies in the two tables. Another error occurred in the case of Ramsey Canyon which was in Table 37 and not 69. These corrections have been made in the Final EIS. The Mt. Graham wet meadows have been dropped because they will be considered in the EIS for the proposed Mt. Graham Astrophysical Area.

29. We disagree that none of the maps with the DEIS allow the reader to locate the various Wilderness Study Areas. The actual WSA boundaries are represented on the Alternative A (current direction) map while the other maps present the actual area to be recommended for wilderness under each alternative. The case in point with Whitmire Canyon under Alternative C is a mapping error that has been corrected in the Final EIS. The actual differences in boundaries between Alternatives C and D is hardly noticeable at the scale used.

Maps directly related to the wilderness issue were and are available in Technical Reports of each WSA. More detailed maps are also available for review.

30. Satisfactory range condition includes the U.S. Forest Service condition class ratings of fair, good, and excellent. The term satisfactory condition has also been defined as "at least a moderately high ecological condition." A moderately high ecological condition is 50 to 75 percent of potential production and equates to a fair range condition class rating.

31. The statement was used in the context of establishing potential environmental consequences. The first part of the statement "while there is only a slight difference in grazing impacts by domestic and wild animals" means that the actual impact to a particular plant is the same whether a wild animal or domestic animal eats it. This assumes the same amount of the

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plant is consumed. The last part of the statement "The partitioning of forage to livestock can conflict with wildlife use" relates to the tradeoff between wild and domestic animals when it comes to utilization of the plants. For example, if a large portion (55 percent or more) of herbaceous vegetation (grasses) is allocated as food for livestock, it could have an impact on cover requirements for Mearn's quail. Another tradeoff example is in the case of actual food requirements between antelope and livestock. If a decision is made to graze a large number of livestock on a range, it could affect the number of antelope because of direct conflicts for the same food source.

32. See response number 1.

33. Your reference to 2621.3 Inventories seems to suggest that we should delay the implementation of the Plan while inventories are completed and the list of MIS is revised. Such an action would not be in the best interest of the wildlife resource since habitat improvements resulting from implementing the Plan would then be delayed; resulting potential population benefits would be delayed and selections of the MIS would only be moderately different. The Manual is a guide which provides objectives we will move toward. It is not intended to delay or stop positive actions.

Your comments do not disagree with our objective of improved riparian and key habitats, nor offer alternatives. They only question the basis for our rationale (lack of the inventories) and the species affected. If you have information regarding specific habitats or species in jeopardy, you failed to mention them.

Some attempt was made to define minimum viable populations for management indicator species in terms of defining currently occupied habitat. For many species, habitat and population data was limited or nonexistent. The assumption was the current occupied habitat was the minimum desirable situation for populations. This assumption of minimum habitat allows for needed habitat and population increases. The habitat acres are displayed in the DEIS, pages 74 and 75, and the Draft Forest Plan, page 141 (Appendix J). Wording has been added to the final documents to explain this.

34. We have added the suggested footnotes.

35. The 408 figure is a typographical error and has been changed to 406. The supply column of Table 9, Draft Plan represents information from various benchmark alternatives and not one benchmark alone. The benchmark alternatives (See Chapter 2, DEIS) were developed to determine the maximum supply of single resource outputs while meeting at least minimum legal constraints for other resources. Each benchmark did produce multiple resource outputs (See Appendix B, DEIS). Therefore, we disagree that these figures do not represent maximum technically feasible supply for each of the resources.

36. See response number 23.

37. We disagree that the process used to select the management indicator species is no longer valid. Species selection is still necessary although the method of monitoring may change as new technology develops.

In any event, this entire section of the Draft Plan has been deleted along with most of Chapter 3 (AMS). This deletion was made because of people confusing Chapter 3 with the proposed management direction in Chapter 4. Much of the AMS material is available in Chapter 3 of the EIS.

38. The DEIS does discuss the impacts of timber and fuelwood harvest on other resources and local economies. It is true the sale of sawtimber will support local industries. The volume not utilized for sawtimber could support new fuelwood industries.

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The volume estimates in the proposed Plan and all alternatives are the result of applying the particular silvicultural methods of the particular alternative. In the case of the proposed Plan, the silvicultural methods are designed to enhance recreation, visual and wildlife goals.

Therefore, we see no conflict with the various statements as you suggest. In any event, this entire section has been deleted along with most of Chapter 3 of the Draft Plan. This deletion was made because of people confusing Chapter 3 with the proposed management direction in Chapter 4. Much of the AMS material is available in Chapter 3 of the EIS.

39. The National Forest System is mandated by Congress to develop and administer the renewable surface resources for multiple use and sustained yield of the several products and services obtained therefrom.

These terms are defined by the Multiple-Use Sustained-Yield Act of 1960 as follows:

(a) "Multiple use" means the management of all the various renewable surface resources of the National Forests so that they are utilized in the combination that will best meet the needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; that some land will be used for less than all of the resources; and harmonious and coordinated management of the various resources, each with the other, without impairment of the productivity of the land, with consideration being given to the relative values of the various resources, and not necessarily the combination of uses that will give the greatest dollar return or the greatest unit output.

(b) "Sustained yield of the several products and services" means the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources of the National Forests without impairment of the productivity of the land.

Therefore, we find it entirely appropriate to have the term "sustained yield" in the Forest mission statement.

We do not believe the suggested wording for the last sentence is necessary. Recreational opportunities and wildlife habitats are two of the resources embodied in the term "multiple uses." We believe it is appropriate to separate the term cultural (social) values from the term rural economy.

40. Appendix J, Draft Plan is intended to show the current occupied habitat for indicator species where data is available. Until better information is available on minimum habitat needs for individual species, we are making the assumption that minimum should not be less than what now exists. In other words, our management intent is to insure habitats are not reduced below current levels.

We agree that improvement should also be provided for, especially with federally listed T&E species. We have revised the objective on page 42 to include the word "improve."

There are six fish species listed in Appendix J. The black bear has been added as a management indicator species. The other species you refer to, desert mule deer, javelina, scaled and Gambel's quail were not felt to be necessary indicator species at this time.

41. See response number 9.

42. We agree and have made the recommended changes.

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43. We agree. The specific wildlife standards and guidelines, previously in Appendix C, have been moved to the Forest-wide prescription. This was done rather than repeat them for every management area. The standards and guidelines are keyed to resource activities and are applicable to more than one management area. The specific wildlife objectives in Appendix C are now found in the appropriate management area prescriptions. This change was made to eliminate repetitive material and make the prescriptions more understandable.

44. See response number 5.

45. We disagree with the cutting cycle change as noted previously. The wildlife and vegetative diversity standards and guidelines were revised to prescribe 20 percent or more retention of an old growth component in fuelwood stands. The 20 percent is intended as the minimum level which we feel is adequate based on past experience.

46. After the big flood of 1983, we examined the watershed of Sycamore Canyon to see if our management had contributed to the exceptional runoff. We found the watershed to be in a good hydrological condition, and were unable to prescribe any needed changes. When the area was proposed as critical habitat for the Sonoran Chub, we again looked and felt that the only threat was from mining. Our conclusion from this is that standard watershed management prescriptions are adequate for these upstream areas, and no special direction in the Plan is needed.

47. All allotments will not be managed at Level D. See response number 21. Guidelines for range management Levels C and D prescribe a 25 year interval to conduct detailed range analysis on individual allotments (Page 127, Draft Plan). With 208 allotments on the Forest this would require analysis on approximately eight per year. This number is consistent with the five percent frequency (ten per year) shown for Range Monitoring Item No. 2. Keep in mind detailed allotment analysis is only one item to be monitored. In addition the guideline for individual allotment inspection frequency is three to four years for Level D and five years for Level C management (Page 127, Draft Plan). This means approximately 40 to 50 allotments would receive visual inspections each year.

48. The management of indicator species and threatened and endangered species are included in all management practices related to wildlife (DU 10 through DU 15). Coordination activities are covered in activity C 12. Therefore, we see no need to add separate management practice or activity codes. The direction to develop more specific habitat components is covered in the monitoring section of the Plan.

49. See response number 43.

50. We have reviewed the definition and guidelines for old growth used by the Northern Arizona Forests. They define old growth as "A stand of timber (or woodland species) that is past full maturity and well into old age. The last stage in forest succession". We have included this definition in our wildlife and plant diversity standards and guidelines. We question if the minimum standards used by Northern Forests for ages, number of trees, and tree sizes is appropriate for Southern Arizona woodlands. For example, a minimum diameter of nine inches may be okay for pinyon-juniper on the Coconino, but may be too small for the oak woodland on the Coronado. We welcome your help and that of others to determine appropriate standards for the old growth component on the Coronado.

    We have revised the guideline to say "Retain 20 percent or more of the stand in mature or overmature age classes as an old growth component. The 20 percent is intended as a minimum and can be increased to meet needs of specific wildlife species as you suggest.

51. We agree and will add your suggestion.

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52. We agree with the term reseed. We cannot agree to the part about "contoured to return to an original preroad condition." This may be desirable in some instances but not in all. Fuelwood roads are often designed to serve other purposes as well as wood harvest.

53. We regularly prescribe barbless wire in antelope ranges and where appropriate for other species, but can not agree that such a forest-wide specification is appropriate.

54. See response number 51.

55. Most water developments on the Coronado are maintained by grazing permittees. They are responsible for inspection and maintenance under the terms of their permits. This is monitored as part of our regular range inspections. A few wildlife waters are maintained by Arizona Game and Fish, who are limited in their ability to do the job by budget constraints.

We cannot afford to inspect all water developments every year. All, including springs, would be inspected and maintained within the stated four year guideline.

56. We assume your recommendation is to help define the old growth component for ponderosa pine and mixed conifer stands. We do not believe these guidelines are necessary due to the age class and basal area silvicultural guidelines already included for Management Area 2. These silvicultural guidelines were designed primarily for wildlife habitat enhancement. Monitoring and evaluation of timber harvest areas will determine if other guidelines are necessary.

57. We do not agree there should be no cuts in Gambel's oak unless absolutely necessary. One way to insure a mixture of age classes is to cut stands. We feel the age class guidelines are adequate as now shown based on past experience.

58. This correction has been made in the Final Plan.

59. We have revised the objective to prescribe an 80 percent or greater level of occupied habitat retention for high density quail habitat (as defined by Arizona Game and Fish). In low density habitat we feel 60 to 80 percent retention is sufficient based on past experience.

We agree the cavity nester habitat should be 80 percent or more retention and have made this change.

We agree to a 100 percent habitat retention for the ridge-nosed rattlesnake. This is already covered in objective #1 found in Appendix C which was moved to the prescription.

All of these changes were also made to the Management Area 4 prescription.

Jeanne Williams

MEMBER:
AUTHORS GUILD
WESTERN WRITERS OF AMERICA

BOX 335

PORTAL, ARIZONA 85632
(602) 558-2436

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September 15, 1985

R. B. Tippeconnic
Forest Supervisor, Coronado National Forest
300 West Congress St.
Tucson, AZ 85701

Dear Mr. Tippeconnic:

1 I would like to urge Alternative D for Cave Creek Canyon and Guadalupe Canyon which would protect 37,290 acres rather than the PA 4,240. They just aren't making any more land like this and it behooves us to take care of it for future generations.

2 When the report admits that the Forest still shows the marks of overgrazing in the 1880s, it is hard to see why permitted use (398,000 AUMs) is 72,000 over the carrying capacity. In a region where a cow may need over a 100 acres to feed, this is serious overstocking and I do not believe for a moment that better management and other techniques will, as I am assured by Forest personnel, bring carrying capacity and permitted use into agreement in the next 20 years or indeed, ever. The Santa Rita experiment where land has been ungrazed for decades and has still not recovered does not bode well for a policy that continues to exploit a fragile resource for the benefit of comparatively few people. The pressure on wildlife caused by making livestock grazing a priority is an unconscionable waste of public resources and I strongly protest it.

3 A number of us, at least in Portal, did not like the format of the informational hearing. While appreciating the effort of Forest representatives to be there, many of us would have preferred a town-hall kind of open group meeting with questions and answers we could all hear at once. In future I hope this kind of graphs-maps one-on-one meeting is not utilized. Instead of providing information, I fear it tends to obfuscate.

4 Last spring there was an indication that barriers would be set up to stop the increasing spillover at South Fork campground. This has not been done and vehicles keep driving farther and farther up. We certainly hope that this will be remedied before next spring's flood of visitors.

Sincerely,

Jeanne Williams

Agency response to Jeanne Williams

1. The acres referred to represent those that would be designated zoological or botanical areas under the respective alternatives. A zoological-botanical designation does not imply a set "level of protection". It is used to recognize areas that have significant examples of flora or fauna. Public use and enjoyment of these areas is encouraged while protecting those values. Lack of this designation does not mean existing values will necessarily be lost. Other management prescriptions can provide the necessary protection.

2. A point that the Coronado Plan and EIS attempts to make is that most significant damage to the land from livestock occurred in the early years of grazing, when many times the current numbers grazed Southern Arizona's ranges. We agree that some acres are currently exhibiting a downward trend in range conditions; but this is a mild situation compared to that of the early 1900's, when the Forest Service assumed management responsibility. You refer to "a region where a cow may need over a 100 acres to feed." This may be true of parts of this area, but such low quality range is quite limited on the National Forests. Ranges of the Coronado are improving with an average stocking rate of about 30 acres per cow. Many of our best sites will support much heavier stocking than that.

   We are puzzled by your reference to "The Santa Rita experiment". We know of no significant areas of the Santa Rita Experimental Range that have been "ungrazed for decades". Numerous small study plots have been protected from grazing there and elsewhere in Arizona. These studies invariably show that elimination of grazing has limited beneficial effect to the range. Where well-managed, moderate grazing exists outside a plot, conditions are usually as good or better than inside. We are happy that you have noticed that exclosure data indicates that the simplistic solution of removal of livestock without attendant management changes is not a viable option.

   The Santa Rita Experimental Range is one of the oldest range research areas in the United States. Long term studies have been conducted on plant ecology and physiology, range management systems, and vegetation modification. Most of the results of these studies are directly applicable to some portion of the Coronado. This work has given us the basis of various management systems and tools which are resulting in greatly improved range conditions and capacities.

   Recent accomplishments in our range management program would seem to indicate that we are on the right track, and that the estimate of balance between capacity and stocking rate by the second period may be conservative. Data used in the plan was completed in 1980 and it shows that 76 "problem allotments" existed at that time. A recent reevaluation indicates that we now have only 41 problem allotments, a net gain of improved management on 35 allotments in five years. At that rate we will easily meet the projection of balance in two decades.

   Wildlife habitat has long been a primary concern of the agency. All projects and plans are closely coordinated with wildlife needs. The Coronado Plan devotes a great deal of emphasis on plans to preserve or enhance the excellent wildlife habitat of the area. A source of pride is the Forest Plan's strong consideration for nongame and endangered species.

3. When designing public meetings, the agency has to consider the most effective way to achieve the inform and involve objectives of both the public and the agency. We will continue to consider all types of meetings from the very formal to the informal, recognizing we can not please everyone. Given the amount of information covered in a Forest Plan and not knowing before hand what specific interests people may have, we have found the informal open house to be a useful tool. In the two years it has been used for review of draft plans we have received very few complaints.

4. The Douglas Ranger District will install vehicle barriers in the spring of 1986 prior to the heavy use season. These may have to be temporary measures until the total site planning and implementation can be completed.

0490

MARIPOSA RANCH
POST OFFICE BOX 246
NOGALES, ARIZONA 85628

September 27

Dear Sirs:

I understand from a talk by John Turner of your office at our Cowbelle luncheon yesterday that the proposed alternative is the only viable plan of the five you propose for the Coronado National Forest. Since the plan emphasizes ranch and recreation management I am glad.

I am for plan B's proposed maximum use of the forest also. At the same time I would like to see more forest land locked away into wilderness areas.

Yours truly,

Hattie Wilson

Harriett D. Wilson

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TUCSON, ARIZONA
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Agency response to
Harriett D. Wilson

All six alternatives (PA, A, B, C, D, & E) displayed in the EIS have advantages and disadvantages. They represent a range of environmentally and technically feasible ways to manage the Forest to respond to the identified issues, concerns, and management opportunities (ICOs). Each alternative will provide improvement in watershed, riparian and rangeland resources so they are maintained in satisfactory or better conditions to insure future management options are kept open. This is achieved directly and indirectly through the management of all resources and uses. Increased rates of improvement reflected in some alternatives, such as B, are related to the ability to finance direct improvement practices. This is reflected in the cost and the level of activity projected for each alternative.

Each alternative provides for some increase in new resource management opportunities, such as new recreation site development or wildlife habitat improvement. Certain new opportunities occur directly or indirectly from the management of all resources and uses. Some alternatives, such as B and C, project significant increases in new resource opportunities which is again related to the ability to finance direct projects.

When financial constraints are placed on any of the alternatives as occurred with PA and A, the rates of resource improvement and ability to respond to new resource opportunities are reduced, thereby creating additional decisions on management tradeoffs affecting the resolution of ICOs. The Proposed Action (PA) places priority on improving basic resource conditions and then sustaining a balance of resource uses compatible with improving the condition of all resources. Therefore, we feel the PA provides a balanced resolution of all ICOs given future budget projections.

0727

YUMA AUDUBON SOCIETY
P.O. Box [illegible]
YUMA, ARIZONA 85364

October 30, 1985

R. B. Tippeconic, Supervisor
Coronado National Forest
300 W. Congress St.
Tucson, AZ 85701

Dear Mr. Tippeconic:

Enclosed are Yuma Audubon's comments on the Coronado National Forest Draft EIS and Proposed Plan.

Please keep us informed of subsequent actions concerning adoption of the plan. We would like to receive a copy of the Final EIS and the version of the Plan as adopted.

The comments below were written by James Rorabaugh and Lothar Schmidt.

Sincerely,

Cary W. Meister

Cary W. Meister
President

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PLANT AND ANIMAL DIVERSITY

1 **Plan, page 6:** Saying that animal diversity is proportional to plant diversity is, perhaps, too simplistic. Animal diversity is probably more closely correlated with community type diversity. But this does not tell the whole story either. Some communities, such as riparian systems, support large numbers of species, others, such as desert grasslands, support relatively few. Also, other components of the habitat besides plants may be very important for maintaining diversity; for example: the presence of water, terrain, presence of rock outcrops, presence of snags.

Rather than just managing for plant diversity, we favor an approach whereby existing community types are enhanced as wildlife habitat, and damaged or depleted types such as desert grassland and riparian are increased in acreage and restored to quality wildlife areas. Management prescriptions would stress use management, or control of grazing, recreation, fuelwood and timber harvest, etc, rather than active management such as type conversions.

2 EIS, page 33: An Executive Order issued by President Carter in 1977 prohibits the introduction of or planting of exotic plants. This document prohibits the Forest Service from using exotic plants.

3 **EIS, page 108:** Table 60 suggests that 650 acres of pinyon-juniper will be converted to grassland. We oppose any actions which would artificially (herbicides, mechanical) remove the pinyon-juniper. Probably diversity would suffer; wildlife use of pinyon-juniper generally involves greater numbers of species than in grasslands. Also, available forage would likely be allocated to cows, rather than wildlife.

RECREATION

4 Plan, page 10: Why are "nearly all sites operated at a reduced service level"? Should not these sites be brought up to capacity before constructing new recreation sites?

5 Page 11, 4th paragraph: What are new organization sites?

6 Page 27: In the past, campgrounds have often been constructed in the best stands of trees, or right on the edge of streams or ponds. We suggest they be constructed away from these critical wildlife areas.

7 EIS, **page 19:** **Summer** homes are mentioned in this section in reference to South **Fork of Cave Creek.** We feel leasing of land to individuals for home sites **is not consistent** with multiple use management policy. Such leases **essentially remove lands** from the public domain and only benefit those few who are lucky enough or have enough money to get a lease. Recreational leases (summer homes) on forest lands should be phased out.

8 EIS, **page 27:** We would like to thank you for the new restrictions on off-road vehicle use in the proposed plan.

WILDLIFE AND PLANTS

9 Plan, page 42: "Maintaining" habitat for game, threatened and endangered, and management indicator species may not be adequate. Some species, particularly threatened and endangered species, may need habitat rehabilitation to prevent their disappearance from the Coronado Forest.

10 Plan, page 43: State game and fish, Fish and Wildlife Service and all other appropriate agencies and individuals should be consulted in any environmental assessment process, not just those in which there are significant impacts.

11 Plan, page 84; item H: This sounds as if species status will be evaluated by examining habitat suitability. We would prefer that species populations be evaluated directly, ie. indeces of abundance, which we feel are likely to be more accurate for most species than habitat suitability indeces.

12 Plan, page 94: All species groups mentioned in Appendix I would be evaluated annually, except Group 4 (species needing dense cover). One of the three species in this group should be monitored annually as well. Off these three, we would prefer you use Bell's Vireo which would also represent lowland riparian areas (elegant trogon represents upland riparian areas)

The Plan proposes to evaluate the status of endangered species only once per decade. This is not adequate for species which are in danger of extinction or extirpation. The status of rare plant species should also be monitored.

13 Plan, page 140: The tarahumara frog is not known to occur in Arizona or New Mexico at this time, however there is evidence that other frogs of the genus Rana, particularly leopard frogs, are declining in numbers. Rana tarahumara should be looked for, but Rana chiricahuensis would make a better indicator species.

SPECIAL MANAGEMENT AREAS

14 EIS, page 19: We favor including all identified RNAs and ZBAs into the Proposed Plan. In the Santa Catalina RNA we suggest controlling the level of recreational use rather than drastically reducing the size of this RNA. We are particularly interested in Ramsey Canyon which is especially deserving of ZBA designation.

15 EIS, page 118: Grazing should be eliminated from all ZBAs and RNAs. Unless the effects of grazing is important to or a part of studies being carried out in these areas, grazing is inconsistent with the stated management emphasis and intensity listed in Appendix C.

TABLE 3

16 EIS, page 24: The meaning of "low, moderate , and high" in this table is not clear.

RANGE OF ALTERNATIVES

17 DEIS, page 41, Table 5: This table illustrates a major problem with this document: there is not enough range in the alternatives. Acreages available by alternative are essentially the same for grazing, exploration-locatable minerals, and development-leasable minerals. Except for alternative C, the range of alternatives in acres available for timber harvest also varies only slightly. Alternatives should be restructured to give use a better selection of management options.

Forest Plan Comments

18 p7 Minerals - The California Federal court action, April 1985 held that mineral estates are to be considered for wilderness, (Sierra vs. Watt).BLM is deferring all decisions involving wilderness status pending Congressional approval for an omnibus Arizona Wilderness review. This review would appear in 1987.

19 p9 Sawtimber sales and firewood sales data implies a need to use and/or modify sawtimber for firewood uses. It is difficult to understand a mature forest product that cannot serve as fuelwood. The energy future for the five (5) periods of the Forest Plan requires this kind of planning. Have you ever found that forest wood is not usable for a campfire? I haven't either.

20 p17 Soil & Water Conclusion Use of check dams is recommended to mitigate effect oferosion due fast moving run-off waters.

21 p26 Table 7 Given over one (1) MM acres of woodland and forest the zero (0) reforestation and 48 acres of timber stand improvement leave little room for catastrophic windstorm, firestorm and a possible marked increase in political or Forest Service policy for sawtimber and fuelwood. Last month I was hiking/cruising in the largest pine forest in Europe: entirely planted, three (3) MM acres.

22 p27 Table 8 provides priority but no planned time to accomplish. A plan should indicate time.

23 p32 Table 13 Washington Camp. This road has very little traffic. One can infer this is an improved dirt road, please indicate the type of surface planned.
Onion Saddle Road I've driven this road and agree it is a low priority. Like many others I won't appreciate the planned fifth time period "reconstruction".
Carr Canyon Paving a road in a unique resource area is not desired. Recommend no expense for paving. The public would only be afforded simpler and more frequent access.

24 p53 DU48 L19 "Minimum safety" is a dangerous practice where the public and its liability are involved. Since level 2 allows limited, high clearance vehicles adequate safety would seem to be mandated.

25 p58 MA3 The boundary on the maps between 3 and 4 is not delimited for the Proposed Action on the map. Cave Creek outside of South Fork is shown as Dispersed Recreation. Where is "wildlife habitat" designation located on the map: Cave Creek outside South Fork? Is the writer referring to MA14?

26 p59 DU16 This prescription seemingly provides the manager without guidance! Both levels A and D are possible.

Forest Plan Comments, continued

27 p64 DU16 Add the requirement that livestock grazing in 11AR and 12R riparian borders requires fencing in order to protect the unique habitat.

28 p66 DU17 & 18 Paragraph 3, last sentence beginning "Systems will attempt .." is ungrammatical and unclear. Which systems are intended? Personification attributes to the nonhuman those characteristics possessed only by the human (Harbrace COllege Handbook p.232). What is "35 to 40% use"? To what does "all full capacity range" refer?

29 p67 DU60 4. Arizona State protected cactus should not be harvested. "Most cactus" should be more specific. Add an item 5 requiring sensitive plants of Arizona and Federal listed species per Appendix I to be protected.

30 p70 DU10 1. Insert "state sensitive native and" before "federally listed".

31 DU16 1. This standard is difficult to understand, it should be reviewed and rewritten. MA7 is a unique resource and where 11AR and 12R are included contains essantial riparian habitat with threatened and endangered species. Good management would preclude livestock grazing at levels D and A.

32 p71 DU48 L19 The same comment as under MA1 p53.

33 p73 DU16, 17 & 18 same comment as p70 DU16.

34 DU60 E05 It is not clear if Christmas Tree selection is intended as "removal of overmature, mature, poor form, low vigor or over-crowded trees". Christmas tree availability and timber stand improvement may be separate activities at times.

35 p76 DU1 MA 8 is Research Natural Area. S & G2 allows permits and precludes motorized vehicles. The meaning of this paragraph is not clear to the reader. The Research Ranch is an MA8 but not "official"; what applies to Research Ranch? S & G2 should be rewritten to convey what is intended.

36 p98 Section ahead of RIPARIAN is incomplete. Aren't items 1 to 5 missing?

37 p99 PROTECTION 1 Monitoring and reporting are deemed to be not time synchronous by policy. However, a NF monitoring "fire suppression effectiveness" would seem to require reporting more frequently than twice a decade.

38 p100 PROTECTION 3 How many automated cameras are proposed?

39 p101 TIMBER & FUELWOOD 1 How many reports are expected?

40 p102 TIMBER & FUELWOOD 2 Comparing Frequency every third year with reporting years 3, 5 & 7 seems not correct ... On year 5 the same report is written as year 3! ? The 7th year report presents one year old material, since the monitoring was done in the 6th year. The 9th year monitoring results are delayed until year 13, four years later. OK? How many "projects" are expected?

DEIS Comments

41 p7 13c Trail bikes should be included.

42 p19 Same comment as p7 of Forest Plan. The DEIS should address the issue. Items c. d. and h. are affected by the Federal District Court finding.

43 p20 to 22 Same comment as p19 above.

44 p23 Table 2 would seem to be premature. Decisions on WSA's are affected by Federal District Court ruling. See remarks for p19.

45 p35 Issue 9 Minerals See remarks for p19.

46 p78 Given status of energy resources and trends increasing fuel costs FS should plan to foster, encourage and facilitate use/modification of sawtimber as fuelwood. Chevron's WORLD ENERGY OUTLOOK June 1985 p3 advises U.S. reserves represent 8.5 years at 1984 production rates !!! National Audubon proposes a change from biomass contributing 3.5% of energy (1984) to 9.8% - 10.8% (2000).

47 p80 This discussion does not address lands withdrawn for mineral use. What are wilderness values for these lands? See comment to p19.

48 p93, 95 Sentence "support for wilderness designation ... come from interests outside local area (more than 100 miles)" is regarded as unfortunate. Aren't those without, those who desire? True. It is plausible that local residents in the midst of a National Forest see the wild forest values daily and resent regulation concerning its use. The State of New York celebrated the "forever wild" status of its Adirondack Park: 100 years. Decisions regarding status changes in those 100 years were state-wide election issues, not local. It is our forest, we all value the forest values.

49 p102 RANGE Aconflict is expressed where livestock has forage that competes to the disadvantage of wildlife in high wildlife use areas. What is the planned mitigation?

50 p109 WATERSHED CONDITIONS Watershed improvements may include check dams of brush or related materialas mitigation.

51 p110 MINERALS See p19 comment.

52 p115 Rights of Way Acquisition Given todays Alternative A with 5 ROW's it is not apparent that an 800% (!!!) increase is truly required... for the PA. Where are these 40 ROW's?

y

53 p122 Alternative C is characterized as emphasizing "economic efficiency" per the first page of the DEIS. Efficiency is often used as a ratio, rather than a difference, i.e. net economic benefit: PNV. Benefit/cost ratio, in the DEIS is seemingly a better measure of economic efficiency. Yet Alternative C has a lower economic efficiency than three (3) other alternatives. The PA has better economic efficiency than C, 4.89 vs. 4.59. The reader is left with the thought that an

DEIS Comments continued

53 incomplete analysis is being presented.

54 p127 Timber Reforestation Table 77 Please see comments for Forest Plan p26.

55 p129 Energy Efficiency - The author is describing energy resources and consumption by alternatives. Energy efficiency relates to how cost and energy saving we can be. This happens while doing our ordinary tasks using/producing energy. For example: more fuel efficient vehicles, fleet driver training to improve fuel savings per mile traveled, gas-fired heat pumps (rather than electric), energy saving techniques for building construction .... Arizona's Energy Office is toll-free 1-800-352-5499 Kayelen Bishop.

56 p131 Soil & Water Its difficult to accept that contamination as described "cannot be avoided". Simply put, fencing at the riparian areas that are threatened would preclude sedementation and fecal contamination from grazing/recreation. (Isn't that what NEPA and the Super Fund are about?) Mining historically has contaminated water's quality. Good managers and, when needed and justified, court rulings have mitigated these effects. Let's not throw up our hands, when faced with open-pit mines, tail dumps or extensive petroleum fields. Would 36 CFR 219.23 (all) condone this contamination?

57 p229 Table 4Given the methodology for our producing these dollar amounts, some comparisons come to mind for a "reasonableness test". A motel near a recreation area would be more costly than the value shown for developed recreation.

It seems that one form of wilderness recreation use can only exist, either "standard" or "less than standard". At any rate certainly not with benefit values of $ 12.52 and 6.64 respectively.

*** The $ 13.12/AUM livestock grazing value indicates a real need to increase livestock operators' grazing fees! A National Forest need not operate in the red for all functions.

Benefit value for hunting/fishing would seem to include game preserve monitoring, stocking, habitat improvement (e.g. DU 10, 11, 12, 61, 13, 14.) Similarly, non-game wildlife use does show costs inherent in DU 15 and part of 61. On this basis, $ 16.90/RVD and 22.76/RVD appear inaccurate and misleading. Isn't the RVD for hunting/fishing more costly than for non-game wildlife use?

58 p247 Table 8 Comparison of Benefits Given markedly different value criteria for Maximums and Zero wilderness acres (PNV assigned, recreation ... to Wilderness Acres with 1981 Outputs) the last column shows less than one-half (½) per cent difference in Present Value Benefit for seven (7) cases. The last, greatest difference is less than seven (7) per cent. How can this be true with vastly different commodities? One would expect greater variations as the commodity changes. The results are difficult to accept.

LMS 10-85

Agency response to
Yuma Audubon Society

1. Your discussion of the complexities of the interrelationship of animal populations with their habitats is well put. It was not the intention of the Coronado Forest Plan to present the basics of ecology, but rather to outline a general plan for the management of this specific land area. When one considers the ecological complexities of a 1.7 million acre area scattered over 17 mountain ranges with elevation ranges from 2,000 to nearly 11,000 feet, the task of describing plant and animal diversity is staggering.

   We agree that proper management of resource uses should be stressed as a key part of maintaining and enhancing ecosystems. Vegetative management practices of all types, such as wood harvest, prescribed burning, and mechanical or chemical control, are estimated to affect less than one percent of the Coronado National Forest each year. (See Table 19, Draft Forest Plan)

2. We are unaware of the executive order to which you refer. All land management agencies in Arizona routinely use "exotic" (nonnative) species for land management. In many cases there are no practical alternatives. We do not anticipate that a majority of resource objectives under the Forest Plan will require nonnative plants. See page 105 of the DEIS. We will always use native species over nonnative species if native species will accomplish our objectives. On some sites which have been denuded by fire or overgrazing, our past experience has shown that native species will not survive and provide effective ground cover. In these cases nonnative species such as orchard grass or Lehman's lovegrass are used to establish ground cover to prevent further erosion.

3. Plant diversity is currently decreasing, because of invasion of woody plants into the grasslands of Southern Arizona. Limited plant control efforts are proposed in the plan to slow or reverse this invasion. Available forage on all areas of the Forest is allocated to both wildlife and cattle needs. With our generally adequate range conditions, interspecific competition for forage is seldom significant.

4. The discussion on page 10 is a statement of the current management situation regarding recreation sites. We agree that existing recreation sites should be utilized and properly managed before constructing new sites. In fact, this is the emphasis given in the proposed Forest Plan.

5. The Coronado National Forest has approximately ten sites developed and operated by non-profit organizations such as the Boy and Girl Scouts and various church groups. These sites are part of their educational and recreational programs. In the past the Forest has received inquiries to develop two such sites on the Safford Ranger District. These are proposals of a need and site specific analysis has not been completed to determine the final location or extent of facilities.

6. Site specific environmental analysis would be needed prior to selection of the final recreation sites or a determination of facility extent. Avoidance of critical wildlife areas is one of the many considerations. The publics' use and enjoyment of the recreation sites and surrounding areas also must be considered.

7. The policy regarding recreation residences (summer homes) is stated on page 91 DEIS and page 62 Draft Forest Plan. The Forest Plan provides for continuation of the permits not already under tenure notice for the Plan period (10 - 15 years). These summer homes on the Forest may be subjected to a separate tenure analysis to determine whether the permits should be continued or phased out based on a higher priority need. However, permit holders must get at least ten years notice of pending phase outs.

8. Thank you for your support of the proposed motor vehicle management policy.

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(continued)

The purpose of the planned policy for managing motor vehicles is to continue vehicular recreational use on existing or new roads and trails. Travel off these roads or trails would not be allowed except by permit.

The policy is not an attempt to "ban" ORVs or "close" the Forest to their use. Under the Forest Plan, the only areas where use of all motorized vehicles would be prohibited are designated wilderness areas and research natural areas. This limitation is already established by existing regulation. This amounts to 24 percent of the total Forest. On the rest of the Forest, vehicle use would be permitted on established roads and trails.

9. We agree. We have added additional wording to standards and guidelines throughout the Forest Plan to provide for improvement of wildlife habitat, especially threatened and endangered species.

10. The Forest Plan gives direction for management of wildlife habitat and other resource uses that may affect wildlife. Therefore, there should be no need to consult on every routine project. The term significant is used to denote those projects out of the ordinary for which we need the assistance of the wildlife managing agencies in developing specific habitat needs. As a matter of practice, we do involve individuals and others in projects of special interest.

11. We assume you are referring to page 94 rather than 84. There is still controversy over how best to monitor management indicator species--populations or habitat. Much population data is lacking for some wildlife species, especially threatened and endangered species. Since habitat management is the primary responsibility of the National Forests, this is where our expertise lies. Population management is the responsibility of State Game and Fish Departments and the U.S. Fish and Wildlife Service. It is our intent to monitor those components--population or habitat--which best indicate the effects of management actions on wildlife species. As we implement and evaluate the Forest Plan, we will be working with wildlife managing agencies and wildlife groups to further develop and refine the monitoring plan. Perhaps, the local Audubon groups could assist with needed monitoring of populations.

12. We agree that the Bell's Vireo is a likely species to be monitored for more than one habitat component.

We disagree that the Forest Plan proposes to evaluate the status of endangered species only once per decade. The monitoring frequency for all species is annually (See item 4, page 94, Draft Plan). The confusion may be in the estimated costs for some indicator species. Most of the cost for item 7H is inventory to gather baseline data.

13. We acknowledge your suggestion. If the other species turns out to be a better indicator species, it can be substituted at a later date.

14. Research natural areas (RNAs) are established to provide opportunities for natural ecological research. In order to provide natural baseline data, the areas must be managed to keep man-induced changes at a minimum. Therefore, management direction for RNAs usually preclude or severely restrict most resource uses, including recreational activities.

We have carefully reviewed all proposed Research Natural Areas and included those in the Plan which seem to have truly unique biological resources, which are in need of special management. With the high diversity and uniqueness of the Coronado, it is difficult to separate out each special area. We recognize that the entire National Forest is a unique place and worthy of special care.

It is important to bear in mind that the RNA program is national in scope and not limited to National Forest lands. It is not necessary or even desirable to have every vegetative type within the Coronado N.F. represented by RNAs on this Forest. Better representatives may well exist

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elsewhere. We strongly support the RNA program and believe the system should include only outstanding representatives of essentially undisturbed ecosystems that can be effectively managed to make optimum use of their nonmanipulative research potential, as well as to preserve and maintain genetic diversity.

Perhaps some further background regarding the Santa Catalina Research Natural Area (SCRNA) will help explain why we believe that area should be reduced in size. The SCRNA was the first Research Natural Area ever established. There were no guidelines for establishment and its reasons for coming into being was somewhat blurred. Probably the most important impetus was to protect the area from undesirable development and maintain its wilderness values. As wilderness designation was not considered a viable option, a new kind of designation was developed as Natural Area. Over the years, the research values have become more important while the protection aspect is no longer significant. The SCRNA is within the Pusch Ridge Wilderness which provides a high degree of protection. Current guidelines call for RNAs of 300-1200 acres. Our proposal for the reduced size area contains excellent representation of the plant communities found in the larger area at a broad range of elevations. The RNA designation enjoys a high degree of respect when it is used to protect truly unique values. We believe it is vital to maintain this respected reputation. It is inconsistent with current RNA intent to designate a 4000+ acre RNA, especially where conflicts exist, and have existed for many years. Misuse or extravagant use of that designation threatens the concept of a "Special Area" (i.e., if everything is special, ultimately nothing is special).

Zoological and/or Botanical Areas have been proposed for areas where truly unique biological resources are in need of special management emphasis to accommodate public use and enjoyment of them. Most of the Coronado is biologically unique and our overall management emphasis is aimed at preservation of these qualities of the land. The ZBA designation has been reserved for those special areas where more than ordinary management emphasis is required. Such areas are identified in the plan, and others were considered as suggested by various respondents.

In an attempt to limit this special designation to truly unique areas, we have excluded large areas such as the Ramsey Canyon Watershed. We feel the most unique area and area most accessible for the public enjoyment is that located on land owned by the Nature Conservancy. We feel management as prescribed for the wilderness area of Ramsey Canyon will provide appropriate protection without additional special area designations.

15. Livestock grazing is not permitted in research natural areas. See the range standards and guidelines for Management Areas 8 and 8A.

Moderate, well-managed livestock grazing can be compatible with management of zoological or botanical areas depending on the particular values to be emphasized. The South Fork of Cave Creek (Chiricahua Mountains) is a good example of some livestock grazing being compatible with management of unique or special areas.

16. These terms refer to the overall management intensity level of the various prescriptions. These levels are defined in Appendix C, DEIS. The levels are directly related to the level of management activity provided in each prescription.

17. While we agree Table 5, DEIS may not suggest a wide range of alternatives for these selected items, it is no reason for restructuring alternatives. For example, a close look at timber harvest methods in Chapter 4, DEIS shows some distinct differences in silvicultural practices and predicted levels of harvest. Also a closer check of the range management section of Chapter 4, DEIS shows differences in management intensity levels between alternatives. The same is true for the recreation and minerals sections of Chapter 4, DEIS. Some of these differences are highlighted in Table 4, Chapter 2, DEIS preceding Table 5.

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18. You are correct that Bureau of Land Management (BLM) administered lands with mineral estates are to be considered for wilderness. This decision precipitated a change in the Coronado FEIS regarding the Guadalupe Canyon WSA. An additional 454 acres were studied for wilderness suitability.

You are not correct, however, that BLM is deferring all decision pending Congresional approval for an omnibus Arizona wilderness review scheduled for 1987. Statewide, BLM is now studying 25 WSAs that include split-estate lands in on-going wilderness studies (including Baker Canyon and Guadalupe Canyon in this joint study). The 1987 review you are referring to will be a statewide wilderness study of 35 BLM WSAs, that include split-estate land, that have yet to be studied for wilderness suitability.

The court decision you refer to has nothing to do with decisions affecting lands administered by the Coronado National Forest, including wilderness study areas or the mineral resources.

19. You are correct in your assumption that excess sawtimber yield should be considered for meeting fuelwood demand. In fact, this very idea is discussed on page 16, Draft Plan and page 78, DEIS.

20. Check dams are considered part of the total job of stabilizing channels.

21. Timber harvest will involve only 311 acres of coniferous forest lands each year (Table 19, Draft Plan). The annual precommercial timber stand improvement needs are based on this harvest level. Because of the silvicultural methods proposed, natural regeneration should be adequate for the lands to be harvested.

Fuelwood harvest will involve approximately 625 acres each year (Table 19, Draft Plan). Precommercial stand improvement is not needed due to the small sizes utilized for fuelwood. Regeneration is primarily through resprouting.

Catastrophic events could create an additional need for artificial reforestation, however, we cannot plan ahead and budget for these unforeseen occurrences. Normally supplemental funds are provided for these events when they occur.

22. We agree that schedules should normally indicate timing. However, funding for recreation site construction is so erratic that a priority listing of the projected needs is adequate in this case. In addition, the Forest Plan recognizes a need for recreation sites beyond what was considered financially feasible in budgeting for the Proposed Plan.

23. Washington Camp - Montezuma Pass Road - This road gets as much traffic as any nonpaved road on the Forest, but does not get nearly enough traffic to justify paving. Based on current traffic volumes, the planned reconstruction would be an improved gravel surfaced road.

Onion Saddle Road - Because of our limited road maintenance funding, this road (like many others) has deteriorated from its original condition. The planned reconstruction will widen some hazardous curves, lessen some grades, and improve the surfacing. These will help make the road safer.

Carr Canyon Road - Because of the "unique resources" in Carr Canyon, people will continue to use the area. The intent is to give the public easier and safer access, and to make the road maintainable. Because of the steep grades on the road, it is very difficult and expensive to maintain a gravel surface on the road. Without the paved surface, the road is not maintainable for passenger cars.

24. Minimum safety means that the roads will be maintained in safe condition for a prudent driver in a high clearance vehicle (i.e., pickup, jeep, etc.). Roads at Maintenance Level 2 are exempt from the Highway Safety Act, and do not require guardrails, and most types of warning signs.

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25. Thank you for pointing out the mapping error. The number "4" which appears on the east side of Cave Creek is incorrect and should be a number "3". Otherwise, the boundaries as shown are correct. The Main Fork of Cave Creek is included within Management Area 3. The South Fork of Cave Creek is part of Management Area 14. The existing recreation sites in both the Main Fork and South Fork are included in Management Area 3A. This Management Area is too small to delineate at the map scale used.

26. Range management levels A, B, C, and D are appropriate to Management Area 3 depending on the particular grazing allotment and other resource needs. The Final Plan was revised to show the estimated acres by each range management level.

27. Various management practices are used to regulate livestock grazing in developed recreation sites whether they are in riparian ecosystems or not. We see no need to single out fencing as a specific requirement. The standards and guidelines for managing livestock in undeveloped riparian areas are prescribed in Management Area 7.

28. Thank you for pointing out our grammatical error. It has been corrected in the Final Plan. Systems refers to "grazing or range management" systems.

The 35 to 40 percent use refers to the average level of consumption that key forage species can tolerate before they would show signs of physiological damage. It is a guideline used to determine and monitor grazing capacity. This level of use assumes well-managed rangelands. Full capacity range refers to all lands deemed suitable for livestock grazing regardless of the range management level. This entire statement is confusing and has been deleted from the Final Forest Plan in favor of the range management intensity level definitions shown in Appendix C of the Final Plan.

29. Cactus or other plant species that are prohibited from sale by the States of Arizona or New Mexico will not be sold. Plants protected by the States cannot be sold by the Forest unless the purchaser has a permit from the respective State. A blanket statement not to harvest cactus protected by the State of Arizona is not appropriate. There may be situations where harvest is necessary and appropriate. An example is the construction of the CAP canal across State lands.

Threatened and endangered plants are protected by existing laws and regulations.

30. Plant species sensitive to States are protected under the respective State Native Plant Laws. See response number 29.

The guideline on page 70 is intended specifically for federally listed Threatened and Endangered plants.

31. We disagree that the intent of the standard/guideline is unclear. We agree Management Area 7 includes areas of unique resources such as riparian habitat. The overall direction for the Management Area emphasizes the unique resources. The intent of the standard is to either intensively manage the livestock (Level D) or to not graze the area at all (Level A). We have added an additional guideline to help determine when livestock should be totally excluded from riparian areas.

32. See response number 24.

33. See response number 31.

34. Christmas trees are considered a product of harvesting the tree resource just as fuelwood is a product. Christmas trees may come from any of the classes of trees mentioned. Normally they are selected from stands of excess or overcrowded trees. Christmas tree harvest is just one means of improving timber stands and meeting other objectives.

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35. All standards and guidelines in Management Area 8 are applicable to the Research Ranch. The intent of guideline number two was to recognize that roads do exist within the Research Ranch and that they would remain open to travel by motorized vehicles. Motorized vehicles would not be allowed in research natural areas. The guideline has been rewritten to clarify this intent.

36. Items 6 through 9 just ahead of the Riparian Section are a typing error. They have been removed in the Final Plan.

37. Reporting is one part of the total job of monitoring. Monitoring is ongoing. Reporting is something that happens at a given point in time. Fire suppression effectiveness can best be evaluated over a five-year period because of the high variance in fire season severity from one year to the next.

38. The number of cameras may vary depending on specific monitoring needs. There may be at least two automated camera systems because of two wilderness areas to monitor.

39. Generally, there would be one overall report each five years. Field inspections would occur annually and result in individual reports.

40. We assume you are referring to Timber and Fuelwood 3 rather than 2. You are correct. The reporting times have been changed to years 3, 6, and 9. The number of projects is the number of individual timber or fuelwood sales.

41. At the time the issues, concerns, and opportunities were formulated, nonmotorized trail bikes were not a major use on the Coronado Forest. Therefore, they were not listed. We agree they are becoming more popular and their use will be monitored during the next planning period.

42. See response number 18.

43. See response number 18.

44. Table 2, page 23, DEIS has to do with the proposed Mt. Graham Astrophysical Area and Mt. Graham WSA. Both of these areas are on Coronado National Forest land and are not affected by the Federal District Court ruling for BLM lands. The table has been deleted in the Final EIS because of the decision to address the astrophysical proposal in a separate EIS.

45. Table 4, page 35, DEIS displays information for Coronado National Forest lands. They are not affected by any Federal District Court rulings pertaining to BLM administered lands.

46. See response number 19.

47. There are no lands withdrawn for mineral use. Lands are generally open for mineral exploration and development unless they are withdrawn from appropriation under the mineral laws.

A discussion of lands withdrawn from mineral entry is found in Chapter 4, pages 110 to 112, DEIS. We have added additional information to Chapters 3 and 4 (Minerals Section, FEIS) to compare acres, such as wilderness, that have been withdrawn from mineral entry to the acres of mineral potential classes.

Here again, these discussions are for Coronado National Forest land and are not affected by any Federal District Court rulings pertaining to BLM land.

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48. Although you may regard the statement as unfortunate, it is true. Decisions regarding wilderness areas are often decided at the State level as happened with the New Mexico Wilderness Act of 1980 and Arizona Wilderness Act of 1984.

49. The statements regarding conflicts were used in the context of establishing potential environmental consequences. The statement "the partitioning of forage to livestock can conflict with wildlife use" relates to the tradeoff between wild and domestic animals when it comes to utilization of the plants. For example, if a large portion (55 percent or more) of herbaceous vegetation (grasses) is allocated as food for livestock, it could have an impact on cover requirements for Mearn's quail. Another tradeoff example is in the case of actual food requirements between antelope and livestock. If a decision is made to graze a large number of livestock on a range, it could affect the number of antelope because of direct conflicts for the same food source. Because the level of conflict can vary by alternative, the mitigation varies by alternative. Measures to reduce conflicts between livestock and wildlife are included in range and wildlife standards and guidelines for each Management Area.

50. You are correct about check dams. The listing on page 109 was not intended to be all inclusive.

51. See response number 18.

52. We believe that with over 1,000 miles of rights-of-way needed to guarantee access to public lands of the Coronado National Forest, access is a critical problem. The proposed Forest Plan calls for a very significant increase in right-of-way acquisition. In order to achieve the goal of reasonable access to all parts of the Forest, we must count on the cooperation of other Federal, State, and County Agencies as well as private landowners who have an interest in road management and access. We feel acquisition of rights-of-way across private lands within the Forest boundary is primarily our responsibility, while access to the Forest boundary should be a shared responsibility of Federal, State, and County Agencies. We are willing--even anxious--to work with other agencies to acquire needed public access. The unique "Islands in the Desert" nature of the Coronado National Forest sets it apart from other forests in the National Forest System. The scattered ownership pattern due to the isolated mountain ranges in this area results in a real challenge to satisfy the need for public access. As noted above, we must count on the cooperation of all to meet that challenge.

The individual rights-of-way are listed in Table 11, DEIS.

53. As a general rule, the Forest Service prefers to use "present net value" (PNV) to compare the relative economic returns of different projects or alternatives. The primary reason for this preference is because of its simplicity and ease of calculation.

There are three commonly used economic analysis techniques for ranking economic efficiency:

1) present net value which is the difference between discounted benefits and discounted costs,

2) benefit-cost ratio (B/C) which is discounted benefits divided by discounted costs, and

3) internal-rate-of-return (IRR) which is a calculated interest rate at which the discounted benefits are exactly equal to the required investment.

When calculated correctly, the three measures will all yield consistent rankings. As they are commonly used, the three will frequently yield different conclusions. For example, if one were ranking three different investment opportunities, it is possible that PNV would indicate that one

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investment was best, B/C might show another was best, and IRR might show another was best. This is the reason that most investment analysis is usually displayed using only one of the techniques. This problem has long been recognized, but has remained relatively ignored in practical applications because of the difficulties in computation. There are three primary reasons for this apparent inconsistency in ranking techniques:

1) projects may differ in size (i.e., the required investments may be different),
2) there may be differences in the expected life of the project (i.e., one project may provide returns for 10 years, another for 30 years), and
3) the discount rate (opportunity cost) can change the ranking (the ranking with a 10 percent discount rate will probably be different from the ranking with a 4 percent rate).

Since we use a consistent discount rate (4 percent as specified by the Chief of the Forest Service), we are only concerned with differences which may arise from the size and life of projects. The procedure used to adjust for size and life of projects is called "normalization". In order to use IRR correctly, adjustments for both project size and project life are necessary. Normalization for project size is required for B/C while PNV yields consistent ranking with or without normalization for size or life. Not having to "normalize" the PNV means that calculations are much simpler to do (and much simpler to explain). If the B/C ratios were "normalized" in the DEIS, both PNV and B/C rankings would be the same. Since PNV gives a consistent ranking regardless of project size and life, we prefer it as an analysis technique.

Technical explanations of the need for "normalization" and the procedures can be found in most "welfare economics" text books. The best source is:

E. J. Mishan. Cost Benefit Analysis. Praeger Publishers, New York (1976).

The best practical explanation can be found in:

J. P. Workman. "Disagreement Among Investment Criteria - A Solution to the Problem." Journal of Range Management. July, 1981.

54. See response number 21.

55. The energy efficiency section on page 129, DEIS discusses both energy to manage the Coronado National Forest to produce goods and services and energy sources of the Forest.

56. The section on page 131 of the DEIS discusses adverse environmental effects that cannot be avoided for all alternatives. Federal Regulation 36 CFR 219.23 refers to that portion of the NFMA planning regulations dealing with resource integration requirements for water and soil resources. One of these requirements is to comply with various laws and regulations pertaining to water quality. Another is to evaluate existing or potential conditions that will influence water quality.

The listing of adverse environmental effects does not imply they will violate law or regulation. It just indicates they may occur at some level. Reference is made to the various management prescription standards and guidelines intended to limit the extent and duration of these effects.

Fencing of riparian areas has little effect on water quality in riparian areas. Sedimentation comes from erosion in the watershed and much of it is geologic erosion which no alternative will affect. Fecal contamination, caused in part by livestock and humans, is at low levels and no alternative will cause an increase to dangerous levels nor a decrease of any measurable amount.

Agency response to
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(continued)

Water quality problems due to mining have historically been isolated and minimal. Serious levels of localized contamination from mines as well as from livestock or humans are treated individually to reduce ecologic or health hazards. Water quality problems originating on private lands and affecting the public lands are handled with the assistance of the Environmental Protection Agency (EPA). Use of the Super Fund is always an option.

57. General Comment:

The benefit values used for recreation and wildlife are questionable.

General Response:

We acknowledge that there is a great deal of apparent disagreement among the public on the "value" of nonmarketed goods and services such as recreation and wildlife. Many of the public comments we have received thus far reflect these differences of opinion and your comments are representative of many throughout Arizona. We believe that many of the comments regarding benefit values stem from a misunderstanding concerning the source and basis of the values used. We would like to briefly describe the nature of the benefit values in question.

The benefit values for recreation and wildlife used by the Coronado are based upon the estimates made for the evaluation of the 1985 National RPA Program. The values used by the Coronado are those in use for the 1985 RPA as of late 1983. The use of the estimates is mandated by Forest Service policy and regulation.

The basic economic concept which was used to derive these benefit values for RPA analysis is usually called "willingness to pay." In conventional economic theory, this value is called "consumer surplus" or "net willingness to pay." Reduced to its simplest form, this value represents the net dollar amount, over and above their actual expenditures, that consumers would be willing to pay in dollars to take part in some recreation activity. Since there is apt to be a great deal of variation among individuals (to some an RVD might be worth ten cents, to others, the same RVD might be worth $25), the value used actually represents an "average" value for all users. This concept of "value" is the standard measure of value in benefit/cost analysis performed by the U.S. Forest Service, the U.S. Army Corps of Engineers, the Bureau of Reclamation, the Soil Conservation Service, the Bureau of Land Management, many state government agencies, and others.

Basic Definition of Economic Value:

The most commonly used technique for estimating users' net willingness to pay for recreation is the "Travel Cost Method." A brief description of this technique will be used to illustrate the concept of consumer surplus. The "Travel Cost Method" relies on variations in travel costs of recreationists to trace out a demand curve for a particular type of recreation experience. The demand curve is usually downward sloping and to the right of the origin, depicting an inverse relationship between quantity demanded and price. The total area under the demand curve may be thought of as the total, or maximum, willingness to pay ("total benefit"). In order to arrive at a net benefit value, the consumer's travel costs must be deducted from this total benefit measure. The area under the demand curve, but above actual travel costs, is a measure of net willingness to pay, or consumer surplus. As can be seen, consumers' actual expenditures do play a role in this estimation process; however, they are a part of the "cost" side of the equation, not the net "benefit" total.

Based upon this kind of valuation concept, the use of actual expenditures by hunters and fishermen is not appropriate as benefit values for valuation of wildlife. Expenditures are useful only for measuring the effect of impact on local economies of some resource management action. The reason for not attributing the indirect spending impact as part of the value of recreation is that the recreationist would

Agency response to
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have spent his money doing something else (or simply saved it), with an equal indirect impact somewhere else. The impact of the recreationist's expenditure on the local community is thus a transfer of spending from one place to another rather than a net addition of value. Use of gross expenditures as a measure of value would actually lead to maximizing inefficiency instead of efficiency. That is, if gross expenditures were used as a measure of value, new recreation sites would be located as far away from population centers as possible, so that people would have to incur large expenditures to get there.

The following brief list of references provides additional detail on this concept of "economic value."

Brown, Thomas C. 1982. Monetary Valuation of Timber, Forage and Water Yields from Public Forest Lands. U. S. Department of Agriculture, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado. General Technical Report RM-95.

__________. 1984. The Concept of Value in Resource Allocation. Land Economics 60(3): 231-246.

Donnelly, Dennis M., John B. Loomis, Cindy F. Sorg, and Louis J. Nelson. 1985. Net Economic Value of Recreational Steelhead Fishing in Idaho. U.S. Department of Agriculture, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado. General Technical Report RM-9.

Hansen, Christopher S. 1977. A report on the Value of Wildlife. U.S. Department of Agriculture, Forest Service, Intermountain Region, Ogden, Utah.

Martin, William E., Russell L. Gum, and Arthur H. Smith. 1974. The Demand For and Value of Hunting, Fishing, and General Rural Outdoor Recreation in Arizona. Technical Bulletin 211. The Agricultural Experiment Station, University of Arizona, Tucson.

Rosenthal, Donald H., John B. Loomis, and George L. Peterson. 1984. The Travel Cost Model: Concepts and Applications. U.S. Department of Agriculture, Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado. General Technical Report RM-107.

Ward, Frank A. 1982. The Demand For and Value of Recreational Use of Water in Southeastern New Mexico. Research Report 465. The Agricultural Experiment Station, New Mexico State University, Las Cruces.

In summary, the belief that expenditures are equivalent to benefit values used in economic efficiency analysis is not supported by conventional economic theory. The "assigned" values used in Forest planning are not based on total dollars spent for travel expenses, food, lodging, equipment, etc. The economic value of an RVD is based upon the consumer's willingness to pay for the RVD, over and above his round trip costs of experiencing the RVD.

Calculation of Wildlife Benefit Value for Coronado:
The $16.90 value for hunting and fishing used for the Coronado is the result of a calculated weighted average using established RPA benefit values for big game use, small game use, and resident fishing use. The nongame wildlife use value of $22.76 is taken directly from the RPA estimates. The benefit values used are those in use for the 1985 RPA Program as of October, 1983. The use of these benefit values is mandated by National Forest Service policy. The weights used are taken from the 1980 Arizona Game and Fish Department data. The base data and calculations are shown below (the one cent difference in totals is apparently due to rounding differences).

Agency response to
Yuma Audubon Society
(continued)

	1985 RPA Benefit Value (Jan. 1, 1982 $)	Benefit Value (4th 1980 $)	Percent of Use	Weighted Values
Big Game	30	27.31	19.2	5.24
Small Game	18	16.39	46.1	7.56
Fishing	13	11.85	34.7	4.11
			Weighted Benefit Value	16.91

The nongame wildlife use uses the RPA benefit value of $22.76 ($25 in January 1, 1982 dollars). The overall result of using these benefit values can be calculated using the total wildlife outputs (Table 9, p.44, DEIS) and the total wildlife benefits (Table 11, p.47, DEIS). For the Proposed Action alternative, the average wildlife benefit value is $18.52 in 1980, 4th Quarter Dollars. Other alternatives are only slightly different. The procedure used to calculate recreation values is similar to the wildlife example.

An "expenditures approach" would yield much higher values for wildlife recreation; however, this approach is theoretically and methodologically incorrect for uses such as forest planning.

Summary Conclusions:

In summary, our review of the procedures and actual values used to estimate the wildlife recreation benefit values for the Coronado National Forest does not indicate a need to revise these values. While it is true that the benefit values used for the Coronado are based on the established 1985 RPA Program benefit values, no convincing evidence has been offered which would indicate that these values are unreasonable or inappropriate. The procedures and values used by the Coronado National Forest are consistent with the direction used throughout the National Forest System.

58. The last column of Table 8, Appendix B, page 247, DEIS shows the absolute change in present net value between benchmark alternatives. This variance is from $7000,000 to $678,000,000. The first eight benchmarks show "relatively" little change in present net value because they all have "relatively" high recreation and wildlife benefits. Recreation and wildlife account for the major share of total benefits as can be seen in Table 12, page 49, DEIS. Therefore, the shifts in "commodity outputs" such as wood harvest and livestock grazing between benchmarks do not generate a large shift in present net values.

0007

HARRIS
MOBILE HOME SALES, Inc.

Reply to [illegible]
[illegible]
792-2621 [illegible]

July 12, 1985

Mr. Tippeconnic

1 On page six of the Environmental Impact Statement, mention is made under roads and trails of bikes and other conflicts concerning other transportation systems. I feel motorized vehicles create noise and pollution which is available at any city. Responsible concerned citizens should use silent and non-polluting forms of transportation. For example at Sabino Canyon, the banned motor vehicles, no one seemed to mind once implemented. Off-road bicycles using existing trails and fire roads. Is their any resistance to this matter. Let me know, if you have any time for feedback.

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Coronado National Forest
TUCSON, ARIZONA
JUL 15 1985
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Thank you

Sincerely yours,

William Giffler

340 EAST GRANT ROAD / TUCSON, ARIZONA 85705 / (602) 792-2621

Agency response to William Zaffer	The Forest Plan would continue to allow use of both motorized and nonmotorized vehicles, including bicycles, on most existing roads and trails. Exceptions to this are in designated wilderness areas, research natural areas and other localized areas of the Forest where resource conflicts have been identified. Please refer to management direction given for each management area. Before any road or trial is closed to a specific use, an environmental analysis is conducted which includes appropriate public involvement.

0721

Gabriel Zinsli
8425 N. 56th Ave
Glendale. Az. 85302

FOREST SERVICE
Coronado National Forest
TUCSON, ARIZONA
OCT 24 1985
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October 16. 1985

Forest Supervisor
Coronado National Forest
300 W. Congress
Tucson, Az. 85701

Dear Sir,

I would like to make some comments about the Coronado National Forest Plan.

1 I am in favor of more recreation opportunities in the forest. but they should be non-motorized (trails. campgrounds. educational facilities rather than more roads). As far as campgrounds are concerned, I have had good experiences as to their cleanliness. I do favor stiff fines for litter bugs.

2 I urge Wilderness designation for all of the Mt Graham Wilderness Study Area (no observatory please!) and for Bunk Robinson and Whitmore Canyon. The Peloncillos are so unique they should be a huge Wilderness Area from the Mexican border to the San Simon Valley.

3 Last week end we visited the Chiricahua Natl Monument and walked towards Cochise Head. We did so on the mining road that leaves Bonita Springs. About 1.2 miles up the road are the abandoned remains of a mine (lead? or silver?) with many tons of equipment rusting about. There is also quite a bit of garbage and erosion of the watershed. Why is this mess not cleaned up by the ex-miners?

I am very fond of the Coronado and its incredible diversity. Please minimize the negative impacts (i.e. development) on this jewel of our Natl Forest System.

Thank you for your consideration.

Sincerely,

Gabriel Zinsli

Agency response to Gabriel Zinsli

1. The intent of the Forest Plan is to provide a balance of both motorized and nonmotorized recreation opportunities within anticipated levels of funding. Priority will be given to maintenance and management, including law enforcement, of existing facilities.

2. Presently the Coronado National Forest contains 339,190 acres of designated wilderness in eight separate areas. This acreage accounts for 19.6 percent of the Forest's total acreage. The 1980 New Mexico and 1984 Arizona Wilderness Acts required the Forest Service to study an additional 90,800 acres in three wilderness study areas; the Mt. Graham WSA (62,000 acres), the Bunk Robinson WSA (15,960 acres), and the Whitmire Canyon WSA (12,840 acres).

   Under an interagency agreement between the Forest Service and Bureau of Land Management (BLM) four BLM areas have been evaluated for wilderness suitability. These areas are the BLM Galiuro WSA (640 acres), Bowie Mountain WSA (6,156 acres), Baker Canyon WSA (4,812 acres) and Guadalupe Canyon WSA (4,145 acres).

   The Forest Plan has been revised to recommend wilderness designation for all 62,000 acres of the Mt. Graham WSA (approximately two thirds of the total 90,800 WSA acres). Our analysis and public comment now indicates there are no conflicts between wilderness allocation and future allocation for the proposed Astrophysical Area whether it be development or no development. Although additional wildlife habitat opportunity does exist under nonwilderness management for species such as deer, the featured species, such as the black bear, would benefit under either nonwilderness or wilderness status.

   The joint Bunk Robinson/Baker Canyon/Guadalupe Canyon WSA and the Whitmire Canyon WSA will not be recommended for wilderness. This will give more flexibility to manage key wildlife species such as deer, Gould's turkey, and desert bighorn sheep. Direct habitat improvement for these key species is often done by prescribed burning. Since these species are not federally listed threatened or endangered species, the use of prescribed fire for habitat improvement would be inconsistent with wilderness policy and would be prohibited. Opportunities for solitude and primitive recreation would not be diminished by proposed management for these areas.

   Prior to the 1984 Arizona Wilderness Act, the Coronado National Forest contained 127,650 acres of designated wilderness. As stated above, the 1984 Arizona Wilderness Act increased designated wilderness to 339,190 acres. This has substantially increased the opportunity for a wilderness experience in Southeast Arizona and Southwest New Mexico. The addition of the Mt. Graham area would also add to the wilderness opportunities, especially those available at higher elevations. This will enable the Forest to respond to nonwilderness recreation opportunities while still providing wilderness opportunities on 401,190 acres or 23 percent of the Coronado National Forest. With low fuelwood and mineral potentials, it is likely the Bunk Robinson and Whitmire Canyon WSAs will remain roadless thus retaining future options for wilderness in these areas.

   The oak-juniper woodland ecosystem found within the joint WSA and Whitmire Canyon WSA is well represented in Arizona Wilderness areas although it may not be in New Mexico. The ecosystem representation was enhanced by the addition of 69,700 acres to the Chiricahua Wilderness by the 1984 Arizona Wilderness Act. A Mt. Graham wilderness would increase representation for the Arizona Pine Forest ecosystem which is not that well represented in existing Arizona Wilderness areas. The special wildlife habitat of Guadalupe Canyon would be protected through management of the upper canyon as a zoological area, with mineral withdrawal, and BLM's Outstanding Natural Area designation in the lower canyon.

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Agency response to
Gabriel Zinsli
(continued)

The BLM Galiuro WSA will be recommended for wilderness. It is a logical extension of the existing Galiuro Wilderness Area. The BLM Bowie Mountain WSA will not be recommended for wilderness because of the inability to insure wilderness values in the long term. Because of two private inholdings and the small size of the WSA, BLM cannot ensure the wilderness values would not be impacted by activities on private land within and adjacent to the WSA. Specific management direction would be determined through regular BLM planning procedures.

3. The mining equipment near the Chiricahua National Monument you refer to is on private patented mineral claims, and of course, we have no authority to require clean-up by the private land owner. Also, since passage of the 1984 Arizona Wilderness Act, all of the land between the main road in the Monument and the patented land is now within the National Monument boundary and no longer a part of the Coronado National Forest.

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